



بنك دبي الإسلامي
Dubai Islamic Bank

CODE OF CONDUCT

DIBPL's Code of Conduct articulates an ethical and professional work culture by setting out general principles of conduct everywhere, every day and by every DIBPL employee.

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A Message from the Chief Executive Officer

Dear Employees,

Dubai Islamic Bank Pakistan Limited (DIBPL) represents the World's first Islamic Bank in Pakistan and hence brings with it a rich heritage and reputation being a fully-owned subsidiary of Dubai Islamic Bank (UAE) which was established in the year 1975.

Our heritage, reputation & global presence require the staff to adhere to the highest standards of integrity and honesty in their business dealings. Accordingly, this code of conduct sets the foundation for the same. The code provides the standards of accountability and adherence to policies, regulations & laws for all the employees associated with DIBPL.

I expect all of you to adhere to the code and conduct yourself as, not only a good human-beings, but as competent Islamic banker; thereby creating an environment cultivated on the basis team-work, mutual respect and professionalism to help the institution achieve its goal of being a truly global brand in the world of Islamic finance.

Sincerely,

Junaid Ahmed
Chief Executive Officer

Term	Definition
Accountability	The obligation of an individual or DIBPL to account for their activities, accept responsibility for them, and to disclose the results in a transparent manner. It also includes the responsibility for money or other entrusted property.
Breach	An act of breaking or failing to observe a law, agreement, or code of conduct.
Bully	Use superior strength or influence to intimidate (someone), typically to force them to do something against their will.
Bribery	Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.
Code of conduct or “the Code”	This written set of guidelines issued by Dubai Islamic Bank Pakistan Limited to its employees and senior management to help them conduct their actions in accordance with its core values and ethical standards.
Compliance	The practice of obeying rules or requests made by people with authority.
Conduct Risk	Refers to any action by Bank or its Employees that leads to customer detriment / disadvantage.
Confidentiality	Confidentiality is a characteristic that applies to information. To protect and preserve the confidentiality of information means to ensure that it is not made available or disclosed to unauthorized entities. In this context, entities include both individuals and companies.
Confidential information	Any information, whatever its form, that is not in the public domain and that must be protected from unauthorised disclosure. Confidential information includes personal information which is information that could identify an individual, such as contact details, personal profile, image, location and email addresses.
Conflict of Interest	Conflict of interest is defined as a situation of actual or perceived conflict between the duty and private interests of a person or entity, which could improperly influence a person or entity in performing their duties and responsibilities.
Corruption	Illegality; a vicious and fraudulent intention to evade the prohibitions of the law. The act of an official or fiduciary person who unlawfully and wrongfully uses his station or character to procure some benefit for himself or for another person, contrary to duty and the rights of others.
Customer	A person who is utilising one or more services provided by Dubai Islamic Bank Pakistan Limited.
CRS (Common Reporting Standards)	State Bank of Pakistan mandated all banks to implement CRS. This is an initiative in which all banks and financial institutions may exchange information to help fight against tax evasion.. This is known as the Common Reporting Standard ("the CRS").
Disclaimer	Clause or statement in a document that tries to prevent creation of a warranty or contract.
Discrimination	The unjust or prejudicial treatment of different categories of people, especially on the grounds of race, age, gender or disabilities.
Dubai Islamic Bank Pakistan Limited / DIBPL	Refers to the Employer, Dubai Islamic Bank Pakistan Limited.
Employees	Refers to full time employees, temporary employees and trainees of Dubai Islamic Bank Pakistan Limited.
Embezzlement	To secretly / fraudulently take money that belongs to an organisation or business.

Entertainment	All forms of corporate hospitality offered to or accepted from counterparts, including: social events, sporting, cultural or recreational activities, ticketed events, drinks, dinners, etc.
Ethics	Moral principles that govern a person's behaviour or the conducting of an activity.
Foreign Account Tax Compliance Act (FATCA)	The Foreign Account Tax Compliance Act (FATCA), which was passed as part of the HIRE Act, generally requires that foreign financial Institutions and certain other non-financial foreign entities report on the foreign assets held by their U.S. account holders or be subject to withholding on with holdable payments. The HIRE Act also contained legislation requiring U.S. persons to report, depending on the value, their foreign financial accounts and foreign assets.
Fraud	Wrongful or criminal deception intended to result in financial or personal gain. Internal fraud: an act of a type intended to defraud, misappropriate property or circumvent regulations, the law or company policy, which involve at least one internal party. External fraud: an act of a type intended to defraud, misappropriate property or circumvent the law, by a third party.
Gift	Personal benefits of all kinds, favour, service, fee or anything of monetary value.
Harassment	The act of annoying or worrying somebody by putting pressure on them or saying or doing unpleasant things to them.
Intangible assets	Non-physical assets such as leases, brands, digital assets, use rights, licenses, intellectual property rights, reputation or agreements.
Intellectual Property	A broad categorical description for the set of intangibles owned and legally protected by a company from outside use or implementation without consent. Intellectual property can consist of patents, trade secrets, copyrights and trademarks, or simply ideas.
Shariah Board	A body appointed by Board of Directors, as per Fit and Proper Criteria (FAPC) set out in Annexure-A of SBP Shariah Governance Framework, with one of its members working as Resident Shariah Board Member (RSBM) to oversee day to day procedures and processes to be adopted for implementation of the Shariah Board's fatawa, resolutions and guidelines and provide clarification thereon.
Misappropriation	The act of taking somebody else's money or property for yourself, especially when they have trusted you to take care of it.
Money Laundering	Any act or process used to conceal the true origin, ownership, and/or purpose of the proceeds from criminal activity.
People of Determination	Any Employee /Customer suffering from a temporary / permanent, full /partial deficiency or infirmity in his/her physical, sensational, mental, communicational or psychological abilities to an extent that limits his possibility of performing the ordinary requirements
Privacy	In general, the right to be free from secret surveillance and to determine whether, when, how, and to whom, one's personal or organisational information is to be revealed.
Retention	The condition of retaining (keeping) something like records, documents, employees, etc.

Related Parties	As per the Companies Act 2017, the expression “ related party ” includes: <ul style="list-style-type: none"> i. a director or his relative; ii. a key managerial personnel or his relative; iii. a firm, in which a director, manager or his relative is a partner; iv. a private company in which a director or manager is a member or director; v. a public company in which a director or manager is a director or holds along with his relatives, any shares of its paid up share capital; vi. any body corporate whose chief executive or manager is accustomed to act in accordance with the advice, directions or instructions of a director or manager; vii. any person on whose advice, directions or instructions a director or manager is accustomed to act: <ul style="list-style-type: none"> • Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity; viii. any company which is— <ul style="list-style-type: none"> (A) a holding, subsidiary or an associated company of such company; or (B) a subsidiary of a holding company to which it is also a subsidiary; ix. such other person as may be specified; <p>Explanation.—For the purpose of this section “relative” means spouse, siblings and lineal ascendants and descendants of a person.</p>
Family Members	“Family Members” in relation to a person means his spouse, dependent lineal ascendants and descendants and dependent brothers and sisters.
Sexual harassment	Any behavior of a sexual nature that affects the dignity of women or men, which is considered as unwanted, unacceptable, inappropriate and offensive to the recipient, and that creates an intimidating, hostile, unstable or offensive work environment.
Shariah	The divine rules and guidance deduced from its legitimate sources: the Qur’ān, Sunnah, consensus (Ijmā‘), analogy (Qiyās) and other approved sources of the Shariah.
Stakeholder	A party that has an interest in an organisation or project. The primary stakeholders in a typical corporation are its investors, employees, customers and suppliers. However, modern theory goes beyond this conventional notion to embrace additional stakeholders such as the community, government.
National Counter Terrorism Authority (NACTA) Proscribed Persons / Organizations	Any individual about whom either there is a credible intelligence-information or who has a history of being linked to a Proscribed Organization can be proscribed by Home Department of a Province and can be subjected to restrictions on travel, speech and business, under the Anti Terrorism Act, 1997. Such persons cannot be employed by Banks nor can be provided any banking / financial services.
Vulnerable Customer	Any customer who, due to their personal circumstances, is particularly susceptible to abuse, discrimination and harm, especially if DIBPL does not act with appropriate levels of fairness and due care. Vulnerable Customers normally encompass low-income, minority groups, People of Determination, elderly customers, illiterate customer or any other disadvantaged group.
Workplace	The workplace means any place where an Employee conducts business or socialises on behalf of DIBPL, or is present as a result of being employed by DIBPL.

Waiver	The voluntary action of a person or party that removes that person's or party's right or particular ability in an agreement. A waiver essentially removes a real or potential liability for the other party in the agreement.
Workplace violence	The violence or the threat of violence against workers. It can occur at, or outside, the workplace and can range from threats and verbal abuse to physical assaults and homicide.

1 DIBPL's Vision, Mission, Values & Positioning

An organisation's **vision statement** is a statement of intent about the future of the organisation, about what the organisation wishes to achieve, in some years' time, as its single-minded long-term goal. This goal of the entity becomes the focal point that all its endeavours should ultimately focus on driving towards.

At Dubai Islamic Bank Pakistan Limited (**DIBPL**), the vision statement is about the long-term goal of where we aim to be, and our purpose statement helps articulate the journey that will help DIBPL to get there.

To achieve the above, we need to have our own set of values that will help drive us to those objectives – guiding philosophies, beliefs and principles that will set the tone for how DIBPL goes about conducting its business.

Below are the DIBPL Vision, Mission, Values & Positioning – guiding principles for us, in our journey towards becoming the most progressive Islamic financial institution in the world.

- **VISION**

To be the most progressive Islamic financial institution in the world.

- **MISSION**

To maintain and improve our position as the world's leading Islamic bank through unsurpassed customer service, innovation, growth and consistent employee engagement.

- **VALUES**

- *Modern*
- *Global*
- *Progressive*
- *Dynamic*
- *Innovative*
- *Islamic*

Collectively and individually, we should be living and breathing these values. We should hold each other accountable to do so every single day.

- **POSITIONING**

To ensure our brand speaks the same language and emanates the core values that embody our new Purpose, we have also updated DIBPL's tagline from the 'Better way to bank' to *#ReadyForTheNew*.

The word NEW is fascinating – for on its own, it stands for something distinct from what has been, a promise of something fascinating and even better.

2 Introduction

Dubai Islamic Bank Pakistan Limited (**DIBPL**) has established its vision and strategic direction and all DIBPL Employees are expected to adhere to the highest level of professionalism, integrity and ethical values. All Employees are advised to read and understand the Code, and use it as a guide to ensure the highest ethical endeavour and customer satisfaction is achieved. The Code sets out the ethical values, standards and guidelines which Employees should adhere to in their dealings with internal and external stakeholders. This Code is developed based on the DIBPL's Core Values. Adherence to the Code is the individual and collective responsibility of all Employees.

2.1 Scope

The standards set by this Code apply to every Employee. The standards set out in this Code are subject to local policies and procedures and to any restrictions imposed by applicable local laws and regulations. The Code supersedes and replaces any prior communications, practices, standards and/or guidelines that are less restrictive or to the contrary, whether written or oral.

2.2 Limitations and Disclosure

This Code is governed by the principles of Shariah, applicable laws, statutory and the regulatory requirements of Pakistan or relevant employment jurisdiction. This Code cannot cover every statutory and regulatory requirement or ethical aspect that arises in the workplace, and many of the standards described herein are explained further in respective policies and procedures. This Code will be reviewed from time to time and revised to reflect any changes in strategic direction or the banking and regulatory environment and will be communicated to Employees through appropriate communication channel(s).

2.3 Breach of DIBPL's Code of Conduct

DIBPL expects all Employees to act in full compliance with DIBPL's policies, procedures, standards, guidelines, and/or applicable statutory and regulatory requirements, including the requirements set out in the Code (**DIBPL's Expectations**) which is also consistent with the highest ethical standards. The success of DIBPL in upholding its commitments also relies on Employees reporting facts and incidents that may involve a breach of the Code. Employees are also required to read, understand and comply with Whistle Blowing policy.

Any failure to act in accordance with DIBPL's Values or DIBPL's Expectations may, depending on the severity of the situation, result in disciplinary action up to and including dismissal without notice or payment in lieu of notice, and may also impact Employee's performance assessment and incentive pay. Violations could also result in civil and/or criminal penalties and/or fines as determined by applicable policies and relevant laws and regulations.

2.4 Questions and Waivers on the Code

Any questions about the Code, policies or any supplemental policies, etc., should be discussed with the direct supervisor or Human Resources Department. For questions regarding the interpretation of applicable statutory requirements, the Legal Department should be contacted and for regulatory requirements, the Compliance Department should be contacted.

Waivers may generally be granted only by the Human Resources Department, however any waiver of this Code for senior management should be approved only by the Board Nomination and Remuneration Committee based on Audit, Legal and Compliance recommendation.

2.5 Report and Raise Non-Compliance

Employees should promptly report any activities or practices (by themselves or others) if the Employee has good reason to believe any part of the principles in the Code have been violated. Failure to report or the concealment of information will result in disciplinary action and may lead to dismissal.

An Employee should report all criminal or unethical conduct, suspicious activity or practice to their direct supervisor, Human Resources, Compliance, or through the channels defined in the Whistle Blowing policy. Should

an employee report suspicious activities or practices, the report will be treated confidentially to the fullest extent possible.

The progressive success and growth of DIBPL depends on the open communication of concerns by Employees without fear of retaliation. DIBPL discourages and prohibits retaliation for reports or complaints regarding the misconduct of other Employees that are made in good faith, in the interest of DIBPL and better serving the customer.

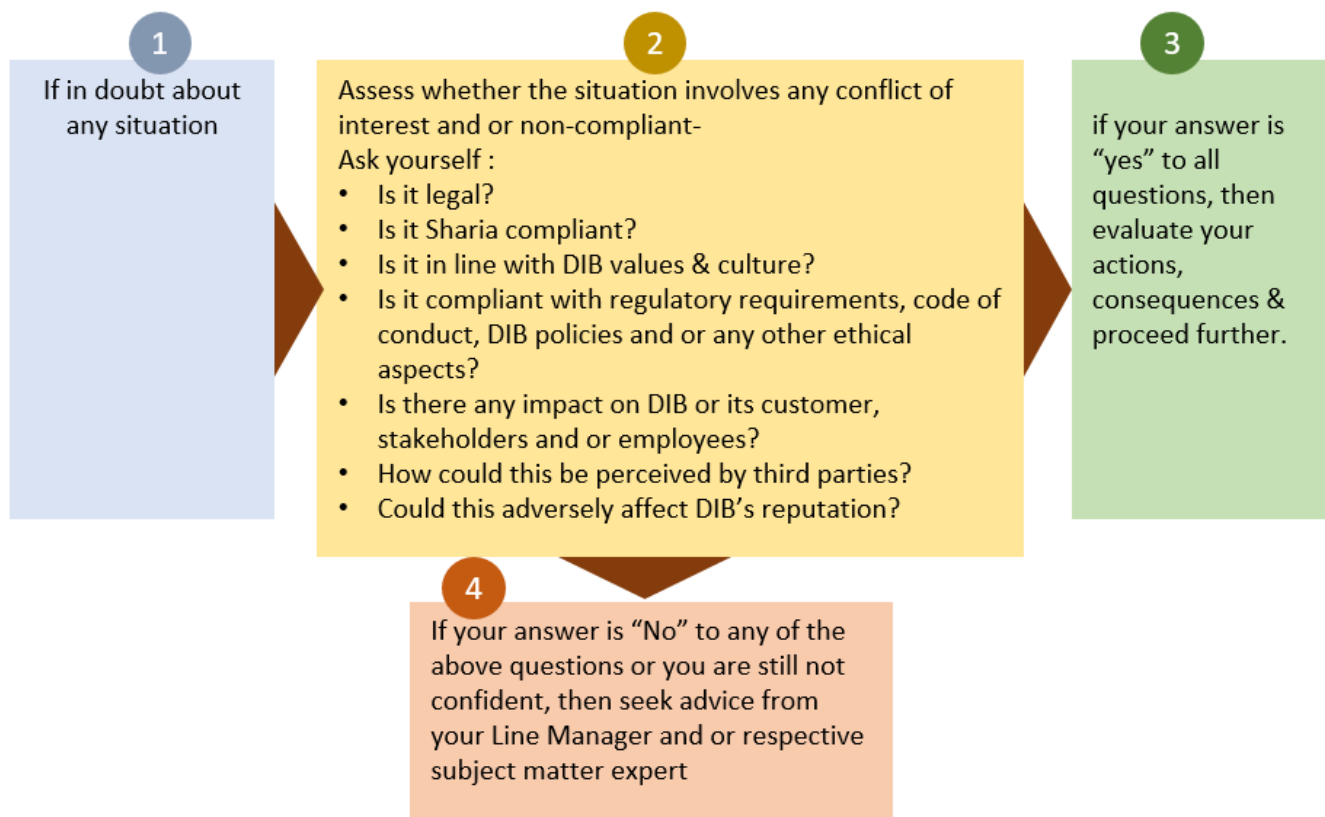
An Employee has an obligation to DIBPL to notify their direct supervisor as soon as possible if they are charged with, or convicted of, theft, fraud or any other criminal offence. Direct supervisors who receive such a report must immediately inform the Human Resources Department.

Should an Employee have any questions on applications of raising non-compliance requirements they should refer to the Whistle Blowing policy or seek guidance from the Compliance Department.

2.6 Acting Ethically and Personal Responsibility

The trust of all DIBPL's stakeholders is earned by Employees acting with integrity and holding themselves to the highest ethical standards. Employees are expected to act with integrity in all dealings with customers, fellow Employees, and stakeholders by adhering to this Code and applying its standards to everything that they do. Employees are accountable for their actions or omissions, and will be held responsible for any improper or illegal acts. Employees should therefore raise concerns, ask questions and escalate matters, as necessary.

Acting ethically ensures that DIBPL serves the interests of its customers and stakeholders and is critical to achieving sustainable success. In making decisions and determining the appropriate course of action, Employees should be guided by what is right and proper, not just by what is allowed or legal. If there appears to be a conflict between this Code and local laws, rules or regulation; local laws, provisions of rules and regulations would apply. When faced with questions that go beyond those addressed in this Code, Employees should follow both the spirit of the Code and related DIBPL policies that cover the issue. When faced with an ethical question or a challenging decision, Employees should ask themselves:



2.7 Audits and Investigations Support

At times, during the work tenure, an Employee may experience audits, interviews, investigations, etc. as per DIBPL policies and or the statutory and regulatory requirements. Employees are required to transparently cooperate with External Aegenceis such as State Bank of Pakistan and DIBPL's Internal Audit, Internal Shariah Audit, Shariah Compliance, Human Resources, Legal, Risk Management and Compliance & FRMU Department and other areas for audit, or to investigate issues that may have arisen within DIBPL.

2.8 Compliance with Shariah Principles

All Employees must adhere to Shariah principles, which must be applied and followed in letter and spirit. All Employees must ensure that all transactions are executed as per the guidance i.e. as per approved policies and process which in turn shall be in line with fatwa issued by the Shariah Board and Shariah Compliance Department (SCD) of DIBPL.

Instances of non compliances will be subject to zero tolerance policy and concerned staff will be held accountable in accordance with Shariah Governance Framework (SGF) requirements.

Should an Employee have any questions on the applications of Shariah principles, the same should be referred to the SCD.

3 Providing Service to Customers

Customers are DIBPL's first priority. We are committed to treating all our customer's fairly and in way which serves their best interests at all times. DIBPL recognizes that customer satisfaction is a vital contributor to DIBPL's sustained growth and success.

As an organisation, DIBPL is committed to:

- **Responsible conduct.** This means conducting business ethically and operating in a transparent, fair, honest and competitive manner.
- **Providing products and services that are suitable for its target market.** This means designing and offering products and services that are suitable and accessible and that focus on serving the best interests of the target customers and that when we give advice such advice is suitable and takes into account the customer's circumstances. In order to achieve this DIBPL is committed to understanding its customers' needs, listening to their feedback and reviewing products and services to ensure they continue to meet the needs of our customers.
- **Supporting informed decision making.** This means giving customers clear, understandable and sufficient information at an appropriate time throughout their relationship with DIBPL to make informed decisions, ensuring that costs and terms and conditions are transparent.
- **Delivering the standard of service that has been promised.** This means providing a reliable and accurate service which meets the needs of our customers.
- **Identify and, where possible, assist Vulnerable Customers.** This means identifying customers, treating these customers professionally and respectfully and, where possible, assisting them.
- **Addressing any concerns or complaints fairly, transparently, effectively and efficiently.** This means listening to customers, acting professionally and courteously and promptly addressing concerns and complaints.

Employees are expected to:

- At all times, act competently with integrity, due skill, care and diligence and in a fair, honest, transparent, efficient, professional and respectful manner with customers at all stages of their relationship with DIBPL.
- Seek to improve the financial literacy of DIBPL's customers.
- Understand the strategic focus set by top management and constantly work towards adopting and transforming themselves in their ability to better serve customers.
- Be familiar with and respect to the State Bank of Pakistan's applicable regulations such as Business Conduct Guidelines, Fair Treatment to Customers etc. for Consumer Rights. For customers with Special Needs/people of determination, kindly refer to prevailing guidelines issued by State Bank of Pakistan and Bank's internal policy guidelines.
- Read and understand the "Branch Service Strategy" and "Fair Treatment to Customer Policy" and use it as a guide to ensure the highest customer satisfaction and fair treatment is achieved.

3.1 Fair Treatment

DIBPL is committed to the fair treatment of its customers. Customers are the most important aspect of our business and all Employees are expected to provide high quality service that is consistent with what the customer wants and expects.

In practical terms, it means that DIBPL and its Employees may not take unfair advantage of anyone or disadvantage them through manipulation, concealment, their ignorance or apathy, abuse of confidential information, sharing or using confidential information improperly, misrepresentation of material facts, discrimination on any basis, undue preferential treatment, conflicts of interest or unfair dealings or practices.

It is essential that when dealing with customers that all disclosures and communications – both oral and written – are timely, fair, clear and accurate and support informed decision-making. This means that information should:

- Be clear, accurate, complete and transparent, for example in relation to products and services information should include the nature and risks of the product or service, applicable fees and costs (at all stages), basis of calculations, terms and conditions and consequences of violating these.
- Be shared proactively before, during and after the point of sale which allows the customer sufficient time to understand the information;
- Be in plain language that is accessible and easy for customers to interpret and understand;
- Be adjusted to meet the capabilities and level of the understanding of the customer or target market;
- Not be misleading;
- Preserves confidentiality where applicable; and
- Where relevant, comply with DIBPL's brand guidelines and regulatory expectations.

Customer-facing Employees play a critical role in helping to ensure fair treatment of its customers and safeguarding DIBPL's reputation. All customer-facing Employees should ensure they understand customers' needs, expectations and interests in order to provide them with suitable and appropriate solutions that lead to the right outcomes for them based on their stated requirements, circumstances (including sensitivity to customers who may be vulnerable), sophistication and attitude to risk. When dealing with customers, Employees should disclose and their employee ID and their relationship with DIBPL. Only Employees explicitly authorized to do so, may provide advice that:

- Provides an opinion, evaluation, recommendation, and/or unbiased information or comparison to a customer;
- Intends to influence a customer's choice or decision to select, buy, sell, hold or subscribe to a particular product or service, related options or interest in a financial product or service,
- and when doing so the Employees shall ensure such advice is suitable and takes into account the customer's circumstances.

For detailed guidelines, reference may be made to prevailing State Bank of Pakistan's rules / regulations and DIBPL's relevant Policies and/or Standard Operating Procedures (SOPs).

3.2 Non-Discrimination

DIBPL is committed to providing an inclusive and welcoming environment and ensuring access to its products and services is made available on equal terms to all customers. All customers shall be treated professionally and respectfully and any discrimination on the basis of religion, gender, age, income, disability or marital status shall not be tolerated.

3.3 Customer Feedback and Complaints

DIBPL is committed to listening to its customers and to continuously improving its products and services to better serve customers. Employees are expected to act professionally and courteously at all times with customers, including when they may be expressing dissatisfaction with a product, service, policy, procedure or actions taken by the Bank, whether verbally or in writing.

Complaints may relate to DIBPL's business practices that have the potential of damaging DIBPL's reputation, brand and market value. Complaints may be received from a complainant directly, through an authorised third party or anonymously and can be transmitted via various means, including letter, telephone, email, or in person. They may also involve a demand, express or implied, for a payment or adjustment.

Employees are expected to be familiar with the feedback and complaint reporting mechanisms applicable within their business areas to ensure that feedback and complaints are promptly reported and addressed confidentially, fairly, transparently, objectively, effectively and efficiently. All errors and irregularities identified through feedback and complaints must be addressed as soon as practicable.

Employees must follow Complaint handling process and promptly refer all complaints to the department responsible for handling the Consumer Grievances. In addition:

- Actual or potential errors or complaints that could result in a client dispute must also be referred to Line Management & Problem Resolution Unit of Service & Quality Department and

- Any complaints, errors or irregularities relating to customers that cause breaches of regulatory or legal requirements or obligations must also be immediately reported to Legal and Compliance & FRMU Department.

4 Information, Communication & Social Media

4.1 Proprietary and Confidential

While working for DIBPL, and continuing after cessation of employment or association with DIBPL, Employees must protect the confidentiality of non-public information obtained or created in connection with activities for DIBPL and shall comply with Information Security Acceptable Use Guidelines.

Confidential information can be written, oral or electronic and includes a wide variety of data deriving from sources such as IT applications, strategies and customer lists. When in doubt, assume all information is confidential. Inside information is a subset of confidential information and discussed later in section 7.6 of this Code. Examples of proprietary and confidential information include any system, information or process that gives DIBPL an opportunity to obtain an advantage over its competitors; non-public information about DIBPL's operations, results, strategies and projections; non-public information about DIBPL's business plans, business processes and customer relationships; non-public employee information; non-public information received in the course of employment about customers, suppliers and distributors; and non-public information about DIBPL's technology, systems and proprietary products.

Employees must not disclose proprietary or confidential information about DIBPL or its Employees, customers, suppliers or partner, to anyone inside or outside DIBPL except on a "need to know" basis (i.e. with other Employees who are legitimately involved in the transaction or providing the services and such disclosure is required for the proper execution of DIBPL's responsibilities) and such recipient is authorised to receive such information. The only exceptions are when such disclosure is authorised by the customer, supplier or partner, or by applicable law (e.g., to supervisory regulators), appropriate legal process and approval from DIBPL management. Where information may be shared, Employees must limit the amount of information to what is required to achieve the stated business purpose and make sure the recipient knows that the information is confidential and subject to restrictions related to its use or dissemination.

It is never appropriate to share confidential information with family and/or friends. Even if it is believed that a family member or friend will not misuse the information, it is not the Employee's information to share.

Finance and Marketing & Corporate Communications Departments are responsible for most of financial and non-financial disclosures externally including Financial Market. Please contact Finance and Marketing & Corporate Communications Departments for any related enquires.

4.2 Customer Privacy

DIBPL is committed to protecting and preserving the confidentiality of customers' information, whether that information relates to financial, personal or business matters. Employees should not discuss or disclose any information regarding DIBPL's customers for any purpose on social media or to anyone outside DIBPL without prior written consent of DIBPL management. Employees should not use private information to try to connect with customers on social networks or for solicitations outside of regular business in accordance with the DIBPL's policies.

4.3 Employee Information

Employees must respect the privacy of their co-workers. Employees who are entrusted with access to personal information of other co-workers must take proper steps to access such information only when there is a valid business reason to do so, to safeguard that information once it is in their possession, and to prevent unauthorised access. Employees should only collect, use and disclose personal information relating to Employees in accordance with the DIBPL's policies.

4.4 Employee Records

Employees are expected to proactively and promptly update their personal information including but not limited to:

- Change in name (Both Employee and Dependents)
- Marital Status (Married / Divorce)
- CNIC / Passport Details (Self and dependents) Contact and Emergency Contact details
- Permanent, Current and Mailing Address
- Employee holding dual nationality / residence visa
- Family Details of Employees

Self-service in HRMS allows Employees to manage and update their personal and dependents' information without the need to request changes through the Human Resources Department.

Employee can visit any of the DIBPL branches or use available channels, where applicable to update their personal records related to Bank accounts (CRS / FACTA etc.)

4.5 Intellectual Property

DIBPL owns all rights to any intellectual property created, updated and maintained by Employees during their term of employment and Employees shall not have the right to claim Intellectual Property. Employees are required to comply with Information Security Acceptable Use Policy at all times.

Employees shall not have the right to reproduce DIBPL's intellectual property, without written consent from DIBPL management.

4.6 Accuracy of Records and Retention

The records, data and information owned, collected, used and managed by DIBPL must be accurate and complete. Employees are personally responsible for the integrity of the information, reports and records under their control. Records must be maintained in sufficient detail as to accurately reflect all DIBPL transactions.

Records should be retained in accordance with SBP Guidelines and DIBPL's policies (as amended from time to time) relevant to the retention of records. Employees are prohibited from destroying or disposing of, any records that are potentially relevant to a breach of law, litigation or any pending, threatened or foreseeable regulatory investigation or proceeding.

4.7 Media, Publishing and Public Appearances

DIBPL has established policies for responding to enquiries from the press and from others legitimately seeking information about DIBPL, inviting Employees to provide quotes or interviews, be part of forums, discussions, presentations, or represent DIBPL, or themselves as individuals in a public space. It is important that Employees do not attempt to answer or respond to such enquiries unless authorised to do so.

The intent is to maintain a spirit of cooperation while always acting in DIBPL's best interest. Therefore, all enquiries related to the above should be directed to Marketing & Corporate Communications Department..

4.8 Internal Communications

One of the most important elements for success at work is effective communication. DIBPL is committed to keeping Employees informed about matters affecting business, such as organisational changes, new policies and statutory and regulatory requirements. It is expected that all communications will be precise, respectful and formal while using any medium of exchange for example written, oral, etc.

If any Employee feels that there is an issue to be raised, they are advised to follow the guidelines below:

- First point of contact in such cases is with the direct supervisor.
- The second point of contact, if the first one fails, is the Head of Department / Unit.
- If that fails, Employees can inform the Human Resources Department.

All communications must be truthful, and must not intentionally directly or indirectly mislead others.

4.9 External Communications

USE A DISCLAIMER - When DIB communicates publicly as a company, it is managed by DIBPL's Marketing & Corporate Communications Department on behalf of DIBPL.

Only authorised Employees are permitted to represent DIBPL. Employees must not use logos and trademarks of DIBPL for personal use under any circumstances.

Employees must not impersonate their comments with that of DIBPL. If an Employee comments anything out of their personal interest, they should make it clear that it is their personal comments or views and not those of DIBPL.

4.10 Social Media

It is each Employee's own choice whether to participate in social media activities on the Internet, such as through a forum, blog, Wikipedia, Facebook, Twitter, LinkedIn, YouTube, WhatsApp or any other form of online publishing or discussion.

Employees should understand that online activities may have an impact upon DIBPL as well as customers, vendors, and or any other stakeholders. Ultimately, DIBPL will hold Employees accountable for ensuring that online interactions are appropriate and consistent with DIBPL's business interests and established policies.

If an Employee chooses to participate in these types of online activities, they are personally responsible for the content they publish and should be thoughtful about how it is presented online. Employees who identify themselves as DIBPL Employees, either directly or as part of the user profile, or are known to be Employees of DIBPL, are responsible for ensuring their profiles and related content are consistent with DIBPL's policies on how to present to the stakeholders of DIBPL, business contacts, co-workers and peers. The simplest approach is to be professional online as is expected by DIBPL when Employees are within the working environment. This means being courteous and polite, respecting cultures, appreciating the diversity of opinions, and adopting a professional approach at all times.

DIBPL cannot monitor or guide every interaction, so Employees are expected to follow the guidelines set out below to communicate responsibly online. These guidelines apply whether Employees engage in these activities in, or outside of, work, and whether or not they identify themselves as DIBPL Employees.

Think before posting – Employees should keep in mind that whatever is posted online is usually permanent and public. Employees must be mindful of participating in any blogs, forums or social networks. Employees should explore the topics being discussed, read about them and contribute only when the discussion is free of malicious or inappropriate content and input advances the discussion.

Protecting DIBPL confidential information on social media – Posts by Employees on social networks may be used by anyone with online access. Employees must therefore not reveal any information that compromises DIBPL's reputation or confidentiality.

Employees must not share, post or comment on:

- The contents of any of DIBPL's policies, procedures, processes and programs (in part or in full) which are intended for the use of Employees and not for public distribution.
- Information about upcoming product releases (if Employees are privy to this information).
- Internal sales and financial information.
- Training programs.
- Speculations or rumors related to DIBPL.
- Anything DIBPL has not officially announced (if Employees are privy to this information), even if Employees are pressed for their personal opinion.

If Employees have any question about whether information has been released publicly, or doubts of any kind, they are advised to consult with their direct supervisor or the Marketing & Corporate Communications Department.

Before embarking on any online activities, Employees should be familiar with the DIBPL Social Media Code of Conduct.

Legal obligation for online posting – Employees will be subject to disciplinary and legal action for commentary, content, or images that are religiously disdainful, defamatory, salacious and unethical, proprietary, harassing, libellous, or that can create a hostile work environment.

Use of social media during working hours- Employees are discouraged to use personal social media accounts during official working hours.

Safety and Privacy- Employees are advised to setup basic privacy settings and using tools to control who can view their personal profile, information and media contents. Employees should use spyware and virus protections.

Monitoring of social media activities - The Marketing & Corporate Communications Department actively monitors all activity related to DIBPL on page (DIBPL's own social media platforms) and off page (external blogs/forums etc). Any adverse remarks/posts against the Bank, its officials, affiliates, subsidiaries and/or any violation of the code and policies of Bank shall be directed to Employee's concerned department and Human Resources department for necessary action.

Employees should-

- Always maintain a professional attitude online.
- Be representative of the values of DIBPL.
- Be respectful of the opinions, cultures and religion of other people.
- Use disclaimers while expressing personal views.
- Be transparent and stick to the facts in all communications.
- Inform Marketing & Corporate Communications Department about any blogs before publishing.
- Always try to add value while interacting with others.
- Protect online privacy and respect copyright laws.
- Be cautious of unknown links and strangers online.
- Always keep online security in mind.
- Respect work commitments.
- Uphold the fundamental principles in this Code.

Employees should not-

- Speak or appear in public on behalf of DIBPL unless they are a designated, authorised representative.
- Reveal non-public financial, operational or legal information.
- Reveal confidential information.
- Reveal any personal information on customers whatsoever.
- Reveal any personal information of Employees whatsoever.
- Engage in arguments with media or customers.
- Let social media interfere with working hours and responsibilities.

4.11 Declaration of Fidelity & Secrecy

In accordance to Section 33A of BCO 1962, all employees of DIBPL are required to submit Declaration of Fidelity and Secrecy before entering upon his/her office wherein they declare that they will perform their duties faithfully and truly and with the best of their skills and abilities. Further they also declare that they will maintain the confidentiality of the information, which they are exposed to or have access to during the course of their duties.

4.12 Correspondence with Law Enforcement Agencies (LEA)

All LEA related correspondence should be handled by the branches / front offices, however branches / front-office staff is required to report this immediately both to Legal and Compliance department and responses shall be drafted / vetted by the in-house Legal department and formal letter will be co-signed by the Operation Manager and the Branch / Area Manager of the respective branch where applicable.

4.13 Correspondence with Regulators

Correspondence with regulators / tax authorities shall be handled with extreme care and response timelines to be followed to avoid any penalty. Compliance Department should immediately be informed for taking necessary corrective action and engagement of other stake holders, where necessary. All non-routine correspondence with the State Bank of Pakistan must be handled by Compliance Department while routine correspondence should be the responsibility of concerned branch / department.

4.14 Investigations / Inquiries from Embassies / Consulate Offices

Concerned Department/Branch should immediately be contacted, as soon as the staff receives any investigation / inquiry from embassy / consulate related to the authenticity of Bank statement or other Bank records being presented by the customer.

It is important to understand that DIBPL's Letter Head is a prime document; therefore staff should ensure maximum protection of this stationery to avoid any misuse.

Employees are encouraged to familiarize themselves with the authorized signature booklet policy to ensure compliance with above in its entirety.

4.15 Communications with Regulator & other Authorities

DIBPL deals with its regulators in an open and co-operative manner by providing complete, relevant, accurate and credible information on time. Reporting of suspicious activities on account of money laundering or other terrorist or drug financing activities is routed through Compliance Department to the relevant authorities..

The employees should use utmost endeavor to promote the interest and goodwill of DIBPL and must show courtesy, professionalism and attention in all transactions / correspondence with officials of the Government, State Bank of Pakistan, Financial Monitoring Unit, Securities & Exchange Commission of Pakistan, National Accountability Bureau, other banks/financial institutions, establishments dealing with the Bank, its constituents and the public. For good order sake, only authorized persons shall deal with such regulating authorities.

5 DIBPL Workplace

5.1 Respectful Work Environment

DIBPL's goal is to have a work environment that reflects and values the best in everyone, where Employees treat each other respectfully and professionally, and where individual differences are valued. The Code applies in the workplace, outside activities and interactions that can affect the workplace, such as work events and other DIBPL-sponsored activities (roadshows, promotions, and events etc.).

5.2 Harassment

One of the fundamental values of DIBPL is treating all Employees equally irrespective of race, gender, disability, education, creed, beliefs, nationality or ethnic origin, color, religion, marital status or any other category. Any discrimination, bullying or any form of harassment including but not limited to sexual harassment will be viewed seriously and will result in disciplinary action and may lead to dismissal.

Use of defamatory, racially prejudiced or lewd remarks or words in any form or medium of communication is not permitted and will be viewed seriously and will result in disciplinary action and may lead to dismissal.

5.3 Dress Code

As representatives of DIBPL, Employees are expected to maintain appropriate dress in the interests of maintaining DIBPL's image as an Islamic financial institution. The general standard expected of all Employees is professional business attire. Sportswear, evening wear and clothes in poor condition are not acceptable. Wearing an Abaya and Head scarf is mandatory for female Employees.

In case of Employees working in special conditions (server room / data center for IT Employees) the professional business dress is not mandatory, but Employees should at all times adapt a decent dress code.

5.4 Punctuality

Employees are expected to attend work punctually at the hours defined by their terms and conditions of employment and instructions issued by DIBPL from time to time. Employees are discouraged to make personal visits during official working hours to avoid work interruption and wasting time.

Absence during working hours can be approved by the direct supervisor based on exceptional reasons. If an Employee does not report his or her absence, it will be considered an unauthorised absence and the Employee will be subject to disciplinary action as per applicable policies.

5.5 Smoking, Alcohol and Drug Free Workplace

Based on Shariah principles and in the interest of health and safety, consumption of alcohol, drugs or the use of non-prescription substances, or any form of intoxication, smoking including electronic cigarette is not allowed in the workplace. Being in the possession of these, or consuming them, in workplace will be treated as a serious offense and will result in disciplinary action and may lead to dismissal.

In addition to office areas, all stairways, kitchens, corridors, toilets, etc. have been declared as No Smoking Zones.

5.6 Safety and Security

DIBPL is committed to providing a safe, secure and respectful workplace. Employees should not engage in violence in the workplace. Violence is defined as threatened (whether express or implied), attempted or actual use of physical force by one person to cause injury to another person or to cause damage to DIBPL's assets or another individual's assets. This includes any threatening statement or behaviour which would give a person reasonable cause to believe that they are at risk of injury, whether or not an overt action has occurred.

Employees who are required to visit DIBPL premises after working hours, weekend and or public holidays have to obtain permission from direct supervisor and inform Administration department accordingly.

5.7 Collaboration and Teamwork

Employees are expected to display a “one team” ethos and act as role models within the team, by sharing knowledge, experience and best practice with other team members.

Employees should provide high quality feedback that is honest, direct and constructive to improve team performance. Employees should also actively participate in regular reviews and development meetings, to assist in achieving team and department and organisation objectives.

Employees should treat their colleagues with respect and honor their rights including advising them whenever necessary and should not denigrate them nor do things that may negatively affect them.

5.8 Personal Calls

Telephone facilities are provided for legitimate business use. The making and receiving of personal phone calls by employees whilst at work is a benefit and not a right. However, DIBPL does recognise that in some circumstances Employees may need to make or receive personal telephone calls.

Where an Employee has the need to make, or receive a personal phone call during working hours the following procedures apply:

- Calls should be kept as short as possible in the interests of minimising disruption to work; and
- Personal calls should be discontinued immediately if a customer is waiting.

Under no circumstances are Employees supposed to use telephones to conduct any business activities, other than for DIBPL’s benefit. Any misuse of the telephone facilities will result in disciplinary action as per applicable policies.

5.9 Social activities and contributions

Employees have the right to voluntarily participate in social activities subject to the local rules and regulations. Employees who choose to participate in social activities or clubs, do so as individuals and not as a DIBPL representative. Employees may not work on a fundraiser or other campaign activity while on office time or use DIBPL property for these activities. Any overt, visible and partisan social activity that could cause someone to believe that Employees’ actions reflect the views or position of DIBPL requires the prior approval of the Human Resources Department.

5.10 Risk Culture

Risk culture builds upon the concept of organisational culture to focus particularly on the collective ability and responsibility to manage risk. Risk culture is the set of values, beliefs, knowledge and understanding about risks, shared by the organisation and its Employees with a common intended purpose. In particular, Employees are the key components of having an effective risk culture.

All Employees shall consistently, within their specific roles and responsibilities, promote through behaviors, actions and words, a risk culture that expects integrity and a sound approach to risk management as well as promotes an open exchange of views, challenge and debate. Further, all Employees are expected to:

- Take personal ownership of risk management as the first line of defense.
- Have open and regular conversations about risks and transparently share information about risks.
- Understand the risks associated with their activities and proactively contribute to ensuring that these risks are reported and appropriately managed.
- Practice responsible risk management and due diligence in decision making.
- Respect and comply with the defined internal controls.
- Report concerns related to risk management through their respective coordinator or directly to the Operational Risk Management Department.
- Develop and improve risk management skills and knowledge, with due support from the Human Resources Department and Risk Management Department.

5.11 Rights of People of Determination

Employees are expected to give special care for including but not limited to colleagues and customers who are people with determination to enjoy all the rights, enhance their respect, preserve their dignity and protect them from all forms of discrimination or abuse, negligence or exploitation. Ref: DIBPL HR policy on Inclusion of Person with Disabilities (PWDs), SBP regulation and policy on Financial Inclusion of Persons with Disabilities (PWDs) and any amendments therein.

6 Statutory and Regulatory Requirements

All Employees must adhere to the statutory and regulatory requirements in both letter and spirit. All Employees must ensure that any activity is executed according to statutory and regulatory requirements within the business context.

6.1 Anti-Money Laundering and Countering Terrorism Financing

Money Laundering is recognised as the process of using the financial system to disguise the illegal origin of the proceeds of crime. Examples of illegal activities that often involve money laundering include drug trafficking, smuggling, fraud, human trafficking, bribery, terrorism and embezzlement.

Money laundering is a problem of global proportions with potentially devastating consequences. It is the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions.

As a financial institution that offers diversified Shariah compliant banking and investment products and services, DIBPL takes seriously its obligation to join with governments, international organisations and other members of the financial services industry to help close off the channels that money launderers use. DIBPL believes that no customer relationship is worth compromising DIBPL's commitment to combating money laundering.

DIBPL Anti-Money Laundering and Combating Financing of Terrorism Policies and Procedures require that DIBPL businesses develop and implement effective anti-money laundering controls and systems to comply with applicable law and to protect DIBPL from being used for money laundering or terrorist financing.

Financing of Terrorism include providing, collecting, preparing or obtaining proceeds or facilitating their obtainment by others with intent to use them, or while knowing that such proceeds will be used in whole or in part for the commitment of a terrorist offense, or committing such acts on behalf of a terrorist organisation or a terrorist person while aware of their true background or purpose".

In Pakistan, the State Bank of Pakistan issues and revises the AML / CFT / CPF Guidelines from time to time for Banks to comply with. Regulations and rules are issued by other government agencies, LEAs and regulators as well such as the Securities & Exchange Commission of Pakistan and the National Counter Terrorism Authority (NACTA) with specific requirements for financial institutions to know their customers, including enhanced due diligence for potentially high-risk customers. Additionally, International/Foreign agencies also have issued lists of individuals and organisations that may be linked to terrorist activities and have required financial institutions to search their records and provide information regarding these individuals and organisations and to take measures to ensure that they do not inadvertently assist the financing of terrorist activities by dealing with these individuals or organisations. DIBPL is committed to cooperating with these efforts to the fullest extent permitted by law. DIBPL employees are also expected to have a understanding of sanctions along with name screening and targeted financial sanctions. Such designated / proscribed entities and persons must not be provided any financial / banking services through DIBPL network. Employees also need to understand that any transaction done with a sanctioned country, entity or person may result, not only adverse regulatory fines and punitive actions for the Bank (DIBPL) but also in personal accountability for the concerned employees as well as a result of their malafide intention or negligence.

Employees should not tip-off any person, including a customer, that a transaction is being scrutinised for possible involvement in suspicious money laundering operations and/or terrorist financing which is considered criminal activity and penalized under Pakistan law and/or relevant regulations.

In the interest to safe guard the bank, it is responsibility & obligation of DIBPL Employee and/or any person / entity associated to report/highlight any unusual activity, behaviour noted in customer/employee account, its transactions including attempted transaction in good faith with prima facie suspicion concern, relating to suspected Money laundering, Terrorist financing and Sanctions Compliance concern to the Compliance & FRMU Department in confidence.

Clarifications with regard to DIBPL's Anti Money Laundering, Combating Terrorist Financing, Countering Proliferation Financing & CDD policy and adherence to Know Your Customer I.e. Client Due Diligence including Customer Name Screening requirements may be directed to Compliance Department. For more details refer to AML/CFT/CPF & CDD Policy.

All Employees must follow the DIBPL's AML/CFT/CPF & CDD Policy and business's specific Anti Money Laundering/Combating Terrorism Financing, process, systems and controls.

6.2 Fraud, Theft or Similar Conduct

Any act by an Employee that involves theft, fraud, embezzlement, misappropriation or wrongful conversion of any property, including that of the DIBPL or any of its Employees, suppliers or customers is prohibited, regardless of whether or not the act could result in a criminal proceeding. This prohibition includes unauthorized use of the DIBPL's equipment, computers and related facilities, or other assets including information and trade secrets.

6.3 Anti-Bribery and Corruption (AB&C)

DIBPL is committed to conducting business in accordance with the highest ethical standards and in full compliance with applicable laws and regulations.

One of DIBPL's core principles is its commitment to conduct business that is transparent, prudent and dependable.

Bribery and corruption have no place at DIBPL. Employees, third parties, suppliers, etc. are prohibited from offering, requesting, or accepting bribes and other improper financial advantages.

Employees may not provide anything of value to obtain or retain business or any advantage, financial or otherwise. "Anything of value" extends beyond cash to include improper gifts, entertainment, charitable and political contributions, and employment, even such offers from government officials, or their related persons.

The prohibition against the provision of anything of value applies not only to government officials and Employees or officials of organisations with government ownership or control, but also includes customers, suppliers, and any person with whom DIBPL does or anticipates doing business. DIBPL expressly prohibits the provision of facilitation payments.

Employees who engage in or facilitate bribery, or who fail to comply with all applicable anti-bribery and corruption laws, and regulations, will be subject to disciplinary action and may be subject to dismissal. DIBPL reserves the right to immediately terminate any business relationship that violates DIBPL's high ethical standards. Any potential breach must be reported to the Human Resources Department immediately.

All employees are required to complete the Anti Bribery & Corruption e-module available over the HRMS.

6.4 Economic Sanctions

DIBPL is committed to complying with applicable sanctions, directives and embargoes.

Economic sanctions are foreign policy tools that impose strict limits on a range of activities, including providing financial services or conducting transactions. They are imposed by governments or international bodies to try to isolate or impede a specified individual, entity or jurisdiction for some specified purpose or activity.

National authorities and supranational organizations (e.g. the United Nations, European Union, OFAC (Office of Foreign Assets Control -USA), HMT (Her Majesty's Treasury) & Government of Pakistan impose restrictive measures against countries, organizations, groups, entities and individuals who infringe internationally accepted behaviors and norms, especially those who have been identified as being involved in proliferation of weapons of mass destruction as: — terrorists or supporters of terrorist organisations; — violators of human rights; or — being involved in bribery and corruption. Such measures are more commonly known as embargoes or sanctions.

All Employees are required to comply with embargoes and sanctions and DIBPL's applicable policies and procedures. Non-compliance can expose DIBPL, as well as employees personally, to civil, regulatory and criminal penalties, including substantial monetary fines and, in the case of individuals, prison. Non-compliance with

embargoes and sanctions also poses a substantial reputational risk to DIBPL. All Employees must adhere to the DIBPL's Sanctions Compliance policy and procedure requirements for more details kindly refer to DIBPL's Sanctions Policy.

6.5 Proscribed Persons or Blacklisted Individuals

In line with regulatory requirement set-forth by the State Bank of Pakistan that prohibits Banks / Financial Institutions from hiring any person found to be designated/proscribed or associated with a designated /proscribed organization/person as per the relevant UNSC resolutions and Schedule I & IV of National Counter Terrorism Authority.

6.6 Reporting of Transactions (STRs/CTRs)

DIBPL's Employees are strictly prohibited to disclose the fact to the customer or any other quarter that a suspicious transaction or related information is being or has been reported to any authority, except if required by law.

6.7 Employees involved in the sale of third party products

All Employees involved in the sale of third party products must adhere to the terms, conditions and regulatory requirements as prescribed by the SBP vide their circular no. BC&CPD Circular No. 08 of 2021 dated August 25, 2021: Master Circular on Sale of Third Party Products. Appropriate disciplinary action should be taken in case of non-compliance with the Code.

6.8 Guidelines on Staff Accounts CPF/KYC and Transactional Activities

Activities in staff accounts should be consistent with the permitted transactional activities. Deviation from permitted transactional activities can also lead into Conflict of Interest situation with DIBPL's customers and vendors, which therefore should be avoided.

For understanding and its implementation thereof, these guidelines are appended as Annexure I & II, and are applicable to all categories of Staff accounts irrespective of the fact whether these accounts are marked/ tagged under Staff Category or not. Scope of these guidelines will be applicable to all contract staff as well.

Staff (Permanent/ Contract) are not allowed to have "Mandate/ POA" authorities in their names for other bank accounts. Existing mandate or POA, if any, should be declared to Compliance & FRMU Department for necessary corrective action.

All employees must comply with the relevant provisions of Compliance Policy, Fraud Policy and AML/CFT /CPF Policy, Human Resources Policy Manual and allied procedural document and for detailed guidelines and/or rules and regulations governing Staff Account and Transactional Activities in staff account, above named document may be referred.

Annexure I

Compliance Guidelines on Staff Accounts Customer Profile Form (CPF) /KYC and Transactional Activities

Part-I- Staff Accounts (CPF/KYC)			
Account Type	Scenario	Permitted / Prohibited	Compliance Remarks
Staff Account: Single	Singly operated by staff	Permitted	CPF is mandatory which should include basic information on staff and source of income (e.g. Salary). To maintain confidentiality salary amount will not be disclosed on the CPF. However if staff has another source of income (e.g. rent on property/ investment) then such disclosure is mandatory with complete details on additional source of income and monthly volume.
Staff Account Joint: With immediate family members like (Spouse/Parents/Children/Sibling)	Joint account with immediate family members	Permitted	CPF is mandatory which should include basic information on staff and joint A/c holder along with their source of income (e.g. Salary). To maintain confidentiality salary amount of staff member will not be disclosed on the CPF. However if staff has another source of income (e.g. rent on property/ investment) then such disclosure is mandatory with complete details on additional source of income and monthly volume. Also if joint A/c holder (family member) has separate source of income, then this information should be captured with complete details on his job/ business/ investment with monthly/ annual income and expected transaction volume/

			count/ month.
Staff Account: Mandate to immediate family members	Staff accounts where operating mandate assigned to any of the Immediate family members.	Permitted	CPF is mandatory which should include basic information on mandate holder with specific reference to why such mandate is necessary and why staff is not using joint account facility. As per mandate authority, mandate holder is only allowed to withdraw funds, and is not entitled to issue any instruction on A/c operation or change of any pertinent information (e.g. address/ mailing instructions).
Staff Account Joint: With Customer (s).	Joint account of staff with any customer/ vendor/ supplier	Prohibited	Exception not allowed.
Staff Account: Mandate to 3 rd parties (not immediate family members)	Staff accounts where operating mandate is allowed to any 3 rd party or customer/ vendor or suppliers	Prohibited	Exception not allowed.
Customer Account: Staff being Mandate	Customer/ Vendor/ Suppliers account where staff is allowed to operate the account under mandate authority being given in the staff name due to whatsoever nature.	Prohibited	Exception not allowed.
Supplementary ATM/Debit Cards	Supplementary ATM/ Debit card issued to non-account holder.	Prohibited	Exception not allowed.

Annexure II

Compliance Guidelines on Staff Accounts Customer Profile Form (CPF)/KYC and Transactional Activities

Part- II- Staff Accounts (Transactional Activities)			
Transaction Type	Scenario	Restriction Class	Compliance Remarks
Transfer of Funds: Term transfer of funds includes cash/ cheque deposit /cheque withdrawal or transfer /internal transfer/ wire transfer / issuance of bank instruments/ internet banking options/ phone banking options.	1. To facilitate customers' not carrying cheque book/ ATM cards. 2. To avoid overdraft in customer account due to insufficient funds to cover bank charges/ withholding tax, etc. 3. Deposit into customer/ vendor account to control intra-day overdraft to honor the cheque, which would return otherwise due to insufficient funds. 4. To accommodate NRP Customers' local payments (Regulatory violation). 5. To accept and/ or deposit / withdrawal of cash / cheque for and on behalf of customer for various reasons. 6. Settlement of any personal nature transactions. 7. Depositing/ accepting 3 rd party (Vendor's) cheque in Staff accounts to facilitate vendors with early disposal of funds as clearing process would take time.	Prohibited	Transfer of funds between Staff Accounts to Customer or Vendor Accounts either "Directly/ indirectly" is not allowed. Staff should not engage into any transactional activity that requires movement of funds between staff account and any Bank Customer or Vendor account, irrespective of the fact whether staff concerned is different from the branch where customer or vendor is maintaining an account. This will include any transaction (movement of funds), which is necessary on account of settlement of purely personal obligation. However, staff, as an exception, is allowed to settle their legitimate transactions (e.g. insurance premium/ tracker charges/ payment of airfare for personal or family travel, purchase of goods for personal consumption directly from vendor). However all these payments should be made through Cross Cheque only and cheque should be issued in the name of Entity and not in the name of individual (customer/ vendor).
Collection/ Delivery of Cash/ Cheque outside bank premises or without engaging tellers	1. Collecting cash/ cheque from customer outside bank premises. 2. Collecting cash on	Prohibited	This will not be applicable on collection staff (filed and collection office/ center staff), who

in the branch premises.	<p>behalf of customer for delivering outside the bank premises.</p> <p>3. Accepting cash/cheque from customers as initial deposit and keeping in own custody instead of depositing with bank.</p> <p>4. Borrowing/ lending from/ to customers/ vendors/ suppliers.</p> <p>5. Settlement of customer/ vendor obligation towards bank through staff own account and settlement thereof subsequently.</p> <p>6. Staff collecting/ accepting / depositing cash/ cheque for and on behalf of consumers on account of down payment/ EMI.</p>		are empowered for such collection. However such collection should strictly be on account of recovery of EMI of outstanding finance.
<p>Third Party Funds:</p> <p>Staff is not allowed to use their personal accounts or other customer accounts to entertain transactional activities, which actually represents third party related funds/ payments/ transactions.</p>	<p>3rd party transactions are referred here as:</p> <p>1. Transactions of individuals who are not bank customers, however known to you or your customers personally or otherwise.</p> <p>2. Depositing cheques/ payment orders, against endorsement, in staff/ customer account, whereas actual beneficiary is the 3rd party who is not maintaining account with DIBPL.</p>	Prohibited	Exception not allowed.

7 Conflict of Interest

Employees face actual, potential and perceived conflicts of interest on a regular basis during the normal course of business. A conflict of interest may occur when an Employee's personal interests, or the activities they perform on behalf of DIBPL, interfere or appear to interfere with DIBPL's or a customer's best interest. A conflict can arise when an Employee acts or has interests (direct or indirect) that make it difficult to perform their work objectively.

Employees are responsible for taking reasonable steps to identify, mitigate, disclose or restrict business activities or practices that may pose a conflict (real or perceived). Some of the potential conflicts of interest that Employees must be aware of are set out in more detail in this section.

To prevent and appropriately manage conflicts of interest, Employees must:

- Be alert to potential conflicts of interests.
- Act with integrity and use good judgment in a manner consistent with this Code and applicable policies.
- Act transparently at all times.
- Avoid personal activities, interests, or relationships that could interfere, or even appear to interfere, with their objectivity.
- Not engage in self-dealing or use their position at DIBPL to derive benefits that are not available to others.
- Immediately disclose any conflicts (actual, potential or perceived) to their direct supervisor and the Human Resources Department.
- Disclose external interests and relationships as required by DIBPL.
- Seek guidance from the Human Resources and Legal Department where required.

Considerations for identifying potential conflicts of interest include:

- Perception: Could the activity or transaction be perceived as a potential conflict or suggestion of a quid pro quo by others?
- Intent: Is the offer or request an attempt to influence the recipient's or the Employee's judgment?
- Impact: Will DIBPL, its Employees, its shareholders or its customers be disadvantaged or negatively impacted if the employee participates in the activity?
- Objectivity: Will the Employee's participation in the activity affect a customer's or the Employee's judgment or ability to be objective with regard to any business decision?
- Time considerations: Will the time required by an outside business activity or outside interest interfere with the Employee's ability to effectively carry out their job responsibilities to DIBPL, its shareholders or its customers?

All Employees should be familiar and comply with DIBPL's Conflict of Interest Policy.

7.1 Gifts and Entertainment

Giving or accepting of a gift or hospitality may appear to create an obligation. DIBPL discourages giving or accepting gifts, hospitality or other benefits that are likely to be perceived as a, or create a potential, conflict with any of the Employee's official duties or DIBPL's policies.

If this is unavoidable, Employees must be extremely cautious not to give or accept gifts of value that might constitute a real or apparent attempt to influence decisions or actions (a gift or hospitality with a value in excess of PKR 1000 or equivalent must be disclosed and approved by the business unit manager and the Human Resources Department). While small gifts of a social or customary nature which are nominal in value may be acceptable but must be reported to Human Resources Department.

Gifts can include, but not limited to tickets, entertainment or sporting events, goods or services, use of a residence or vacation home, payments of travel or lodging expenses, cash Vouchers / gift card / gift certificates, discounts or special rates on products and services, or charitable contributions made on someone's behalf.

The Code does not cover giveaways or gifts to customers for business promotion or which form part of a business promotion campaign.

7.2 Operating Bank Accounts

Employees are prohibited from accepting authority or Power of Attorney from customers to open and/or operate customer's accounts as an agent or attorney OR opening joint account with a customer or supplier of the Bank.

Employees are advised;

- Not to authorize/issue power of attorney to operate their DIBPL accounts to any individual.
- Not to use their DIBPL accounts for any non-personal financial dealings.
- Not to transfer funds internally between colleagues.
- Not to open more than one CIF number.

In the event that an Employee issues a cheque and returned unpaid due to insufficient funds in his/her current account, he/she will be subjected to disciplinary action as per applicable law.

7.3 Transactions with Related Parties

Employees at all times shall comply with the prevailing regulatory requirements for related party transactions as defined in Section 208 of Companies Act 2017 and related State Bank of Pakistan (SBP) regulations. Employees shall also comply with the following requirements so long as any provision thereof does not conflict with any provision of the prevailing regulatory requirements.

Employees must notify their direct supervisors of any business relationship or proposed business transaction that DIB may have with any organization in which the employee or a related party has a direct or indirect interest or from which the employee or a related party may derive a benefit, or where a related party is employed, such a relationship or transaction may give rise to the conflict of interest. In all instances employees should ensure they avoid any conflict of interest in respect of assessing, approving and monitoring such transactions.

Employees are required to disclose, to the extent they are aware, the financing which their family members (as defined prevailing prudential regulation) intend to apply for or have secured from DIBPL.

Should the employee have any questions on applications of related party business dealing requirements, the same should be referred to Human Resources Department and/or to the Related Party Transactions Policy.

7.4 Employment and Business Activities Outside Of DIBPL

Circumstances may arise whereby an Employee may desire to engage in additional employment or business activities apart from DIBPL.

As a general rule, DIBPL expects Employees to devote their time at work, and to avoid any outside activity, employment, position, or association that might interfere or appear to interfere with the independent exercise of their judgment regarding the best interests of DIBPL.

Employees must take prior approval from the Human Resources Department if they have already and/or want to engage in any additional employment or business activities outside of DIBPL. Employees may engage in outside business or employment that does not directly or indirectly conflict with DIBPL's activities or interests subject to obtaining prior approval from the Human Resources Department. In certain cases, there may also be regulatory restrictions which may apply and DIBPL reserves the right to require an employee to limit or resign from external positions.

Employees should declare the details of the businesses owned/sponsored/freelancing by them and should obtain written approval from the Human Resources Department (on the Business Information Declaration Form).

Employees cannot sell any product or service through social media, or otherwise, that would compete with any of products or services offered by DIBPL or any of its affiliates.

7.5 Employment of Relatives

Employees should avoid situations in which their personal relationships could interfere with their ability to create the best outcomes for DIBPL and its customers. DIBPL therefore discourages the employment of family members of Employees. Ref: DIBPL HR Policy on Employment of Close Relatives.

7.6 Insider Trading

No Employee shall deal (whether directly or indirectly) in the shares or other securities of DIBPL and its listed subsidiaries and affiliates and issuer of listed securities with which DIBPL usually engages during the normal course of business at any time when they are in possession of inside information (i.e. material, price sensitive non-public information) obtained as a result of their employment by, or their connection with, DIBPL which is not generally available to the shareholders and to the public and which, if it were so available, would be likely to bring about a material change in the market price of the shares or other securities of the entity. No such non-public information shall be disclosed to any third party (including but not limited to family members, analysts, investors and news/social media etc.). The restriction of dealing in shares or other securities of DIBPL and its subsidiaries and affiliates shall also apply during trading blackout periods.

Employees shall declare and ensure not to deal directly or indirectly in the listed securities issued by customers, if they are in possession of inside information relating to such customers by virtue of their professional relationship with them. Employees shall bear all legal consequences in case of leaking information and data related to DIBPL and its customers, or giving advice on the basis of the information in their possession and shall notify DIBPL of any trade carried out on the listed securities issued by DIB, its subsidiaries and affiliates.

Employees should not indulge in speculative transactions, which may give rise to further financial commitments, including (but not limited to) margin trading in any form, or trading on any futures or options exchanges.

An Employee shall not procure another person directly or indirectly to deal in the Investments or related investments in which the Employee has inside information.

For further information and guidelines please refer to the Compliance Policy.

7.7 Personal Financial Dealings

DIBPL Employees and their families are encouraged to use DIBPL products for their personal financial requirements. Such services, however, are to be provided on the same terms and conditions applicable to all customers as a standard process. Any non-standard business arrangements between an Employee and DIBPL must be pre-approved by the concerned Head of Department and the Human Resources Department.

Employees should not take cash or other valuable items from any customer, other Employee, supplier or consultant of DIB that may result in a conflict of interest.

Similarly, an Employee should not receive preferential treatment from suppliers, service providers or customers without pre-approval from his/her Head of Department, unless such preferential treatment is available on the same terms to all similarly situated persons.

In the event that an Employee issues a cheque which is returned unpaid due to insufficient funds in his/her current account, he/she will be subject to disciplinary action as per applicable law.

Employees are encouraged to maintain a healthy financial status including high credit rating.

8 Safeguarding & Protecting DIBPL Interests

8.1 Fair Competition

DIBPL is committed to competing fairly and ethically. Unfair competitive actions include making false statements about competitors, misusing a competitor's trade secrets or providing a competitor with information about pricing that may lead to price fixing. Employees are prohibited from engaging in practices or behaviours intended to, or resulting in, eliminating or lessening free and fair competition. Employees are required to follow the prevailing regulatory requirements on Fair Treatment of Customers, Prohibited Banking Conduct etc. as amended from time to time.

8.2 Emergency Preparedness

DIBPL has a well-defined Business Continuity Plan, and all Employees are expected to understand their roles and responsibilities to support the specific plans for their business. They should know how to respond during any emergency situation enabling smooth business operation during potential business interruptions.

8.3 Protecting DIBPL Assets

Employees are responsible for safeguarding the tangible and intangible assets of DIBPL and its customers, suppliers and partners that are under their control. DIBPL assets may be used only for proper official purposes.

It is the duty of each Employee to utilise all facilities and equipment provided by DIBPL for performing their duties with due care and to bring to the notice of the concerned team members any malfunction; Employees shall be held responsible for any damages to such facilities due to negligence or carelessness.

8.4 Use of DIBPL name, facilities or relationships

Employees should not use DIBPL's name, facilities or relationships for personal benefit or for outside work. Use of DIBPL's name may be permitted based on the explicit consent from Management / Marketing & Corporate Communication Department. In any platform Employees should speak respectfully about DIBPL, their current and former colleagues, customers, and competitors. Employees should refrain from engaging in name calling or behaviour that will reflect negatively on DIBPL's reputation.

Abuse of DIBPL's logos or trademarks, making unfounded or derogatory statements about DIB, or posting misrepresentation on behalf of DIBPL is not viewed favourably by DIBPL and can result in disciplinary action and may lead to dismissal. Employees are encouraged to always write knowledgeably, accurately and using appropriate professionalism.

8.5 Expenses

Employees may claim reasonable business expenses consistent with DIBPL's expenses policies. Employees are prohibited from making excessive, fictitious or unnecessary claims. All expense reports should be submitted on a timely basis.

8.6 The Environment

Reduce, Reuse, Recycle — three great ways Employees can eliminate waste and protect the environment. *That's OUR environment.* The environment is everything around you including the air, water, land, plants and man-made things. DIBPL is committed to continuously improving business practices to reduce environmental impact.

Employees are expected to:

- Engage in electronic media rather than print communication.
- Encourage customers to subscribe to e-statements.
- Think before printing.
- Print documents double sided when possible.
- Turn off lights and electronics when they're not in use (for example printers, computers, projectors, etc.).

8.7 Human Rights

DIBPL supports and respects the protection and advancement of human rights, and is committed to being a responsible corporate citizen. DIBPL complies with the laws and regulations applicable in Pakistan and encourages the protection of human rights through internal policies and procedures. DIBPL strives to conduct business operations to preserve, protect and promote the full range of human rights for Employees, customers and other stakeholders. Additionally, DIBPL shall comply with all the relevant guidelines issued by the State Bank of Pakistan and /or other regulatory bodies on the subject along with guidelines that promote providing equal employment opportunities (including opportunities of employment to persons with disabilities as well).

9 Commitment and Accountability

9.1 Commitment of every DIBPL Senior Management & Managers

- Make a personal commitment to act in accordance with DIBPL standards of ethical business conduct and to communicate this commitment to my subordinates.
- Embrace DIBPL's values and lead by example in behavior and actions.
- Clearly communicate and implement this Code.
- Periodically discuss ethics issues during team meetings or training sessions.
- Ensure each Employee understands and adheres to this Code
- Devote sufficient time at work without indulging in personal commitments
- Reinforce and monitor Employees' behavioral standards, compliance with this Code performance and competence.
- Maintain a healthy financial status including high credit rating.
- Ensure that all policies, procedures and actions conform to this Code.
- Endeavour to be a role model and give visible guidance and support with regard to the upholding of this Code.
- Recognize and positively reinforce good behaviors and act swiftly to intervene in the case of inappropriate behaviors.
- Report breaches (perceived or otherwise) of this Code or the law.

9.2 Commitment of every DIBPL employee

- Live the DIBPL values at all times.
- Be aware of, understand and adhere to this Code, policies and legal and regulatory requirements which apply to their roles and activities.
- Respect and observe the principles of the Code to ensure business practices that are beyond reproach.
- Competently, efficiently, professionally and ethically discharge their duties, acting at all times within the authority entrusted to them and, where applicable, maintaining the relevant professional qualifications for their role.
- Exercise due skill, care and diligence and in a fair, honest manner while carrying out their roles and responsibilities and representing DIBPL.
- Uphold Shariah principles.
- Respect and honor confidentiality whether during employment with, or after leaving, DIBPL.
- Maintain a healthy financial status including high credit rating.
- Devote sufficient time at work without indulging in personal commitments
- Maintain sufficient knowledge of DIBPL's products and services as appropriate for their role.
- Report breaches (perceived or otherwise) of the Code, Islamic Shariah or the law.

Annexure 1

Acknowledgment

By the virtue of the Employee Code of Conduct and in compliance with the enforced laws, regulations, State Bank of Pakistan Circulars and Dubai Islamic Bank Pakistan Limited's Policies,

I understand and confirm that:

- I hereby acknowledge and confirm that I have read, understood and agreed to adhere with Dubai Islamic Bank Pakistan Limited's Code of Conduct & Service Code and its amendments from time to time.
- I further acknowledge that it is my responsibility to understand, act in line, follow and adhere to all DIBPL standards outlined in the Code of Conduct as well as all applicable laws, regulations and statutory requirements.
- Any violation of the COC or any HR, ethics or compliance policy or procedure or any applicable laws /regulations and/or regulatory /statutory requirements is grounds for disciplinary action, up to and including termination from employment and legal prosecution.
- I am obligated to report any suspected or observed misconduct or violation by any executive, manager or Employee, and that failure to do so is in itself a breach of the COC and DIBPL Policies.
- I shall ensure that my declarations and responsibilities required pursuant to the COC are always fulfilled and completed and any information/data are accurate, complete and up to date.
- I shall disclose through my declaration, as and when required, any credit facilities which I, or my close relatives (as defined in section 7.3 of the COC) intend to apply for or have secured from DIBPL.
- I am required to declare any activities that might give rise to a real, apparent or potential conflict of interest.
- I have sufficient time available to manage the time commitments required for my role(s) in DIBPL and relevant competent authority regulations.
- I am responsible to maintain full confidentiality of any data and information regarding DIBPL, DIB Group, its shareholders, Board of Directors, customers and/or its partners, and that I shall bear all the legal consequences in case of any breach and leakage of any such information or data or giving advice on the basis of the information in my possession.
- I have to notify DIBPL of any participant or a contribution in a manner that is directly or indirectly involved in any activity or trade in any way competition/similar to the same business of DIBPL and any company within the DIBPL Group or any trade carried on the securities of DIBPL and any company within the DIBPL Group structure before and after those trades.
- I shall immediately inform DIBPL I intended/participated in any such activities/trade in the future, which are similar to DIBPL/DIB Group business activities and/or any competitor.
- I further acknowledge that this acknowledgement and undertaking is valid and irrevocable.
- I hereby agree to indemnify, release and forever discharge DIB Group, its officers and employees from any and all claims (including third party claims), demands, causes of action, rights, obligations, damages, whether actual or punitive, attorney's fees, costs and liabilities of any nature whatsoever whether or not now known whether directly or indirectly, which may arise as a result of any untrue information and/or failure to commit with the aforesaid and/or any other reason.
- I acknowledge my responsibility regarding the accuracy of the aforesaid and my adherence to DIBPL applicable policies and Code of Conduct from time to time.

Annexure 2

Declaration

Employees face actual, potential and perceived conflicts of interest on a regular basis during the normal course of business. A conflict of interest may occur when an Employee's personal interests, or the activities they perform on behalf of DIBPL, interfere or appear to interfere with, or can be perceived to interfere with DIBPL's or its stakeholders' best interests.

DIBPL employees are required to declare any activities that might give rise to a real, apparent or potential conflict of interest.

I undertake to ensure that my declarations are accurate and complete at all times.

I hereby declare that I have (You can select multiple options) *

- Employment Outside DIBPL (Full/Part-time)
- Business Activities/Owned Outside DIBPL
- Related Party Transactions within DIBPL
- Freelancing / Consultants
- Gift(s) (a value in excess of PKR 1000 or equivalent)
- Board Membership
- Employment of Relatives

Please provide details as clear as possible.

Employee Name : _____

Employee Number : _____

Department/Branch : _____

Signature: : _____

Date : _____