ABU DHABI COMMERCIAL BANK PJSC
2025 ESG REPORT

Our approach to sustainability provides a clear commitment to value creation.



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About this report

Purpose

This Group ESG (Environmental, Social and Governance) Report complements our 2025 Annual Report and Integrated Report, providing further information on the Bank's sustainability strategy, performance and progress over the year. It represents an additional channel in our communications with stakeholders, promoting transparency on how Abu Dhabi Commercial Bank PJSC (ADCB) mitigates ESG-related risks and harnesses opportunities.

Scope

The data and information in this report reflect activities undertaken during the 2025 fiscal year (1 January – 31 December 2025). The report includes information about the ESG performance of ADCB, and all its subsidiaries, including branches within and outside of the UAE.
For the full list of entities, please refer to 'Scope of reporting' in the Data and Assurance section.

Reach us

Sustainability
sustainability@adcb.com
www.adcb.com/esg

Investor Relations
ir@adcb.com
www.adcb.com/ir

Reporting standards

This report has been prepared in accordance with international and national reporting standards and guidelines:

- Global Reporting Initiative (GRI) Standards
- The Sustainability Accounting Standards Board (SASB) 'Industry Standards' (now part of International Financial Reporting Standards (IFRS) Foundation)
- The Greenhouse Gas (GHG) Protocol: A Corporate Accounting and Reporting Standard
- Partnership for Carbon Accounting Financials (PCAF) Standard
- The UAE Securities and Commodities Authority (SCA) sustainability disclosure requirements
- Abu Dhabi Securities Exchange (ADX) ESG Disclosure Guidance for listed companies
- Central Bank of the UAE (CBUAE) Principles for sustainability-related disclosures for reporting entities
- CBUAE Climate-related Financial Risk Management Regulation

In addition, ADCB's disclosures are informed by the IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information, and IFRS S2 Climate-related Disclosure Standard (aligned to the Task Force on Climate-related Financial Disclosures (TCFD) recommendations). These frameworks are designed to provide stakeholders with relevant information to make strategic decisions about material sustainability topics that impact long-term value creation.

Assurance

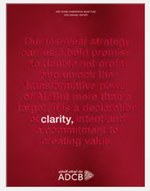
ADCB has obtained independent limited assurance by Deloitte on the preparation of our Greenhouse Gas (GHG) emissions and sustainable finance metrics, in accordance with the calculation methodologies detailed in this report. For further details please refer to the independent limited assurance report.

For the remaining metrics, the Bank has adopted an internal review and approval process as part of its approach to ensure the quality and accuracy of reported data.

MORNINGSTAR Sustainalytics **Regional** ESG Leader 2026

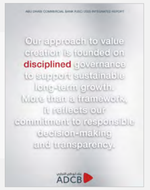
One of only five banks in the Middle East and Africa region to be awarded the 'Regional top-rated' badge by Sustainalytics

ADCB 2025 reporting suite



2025
Annual Report

2025
Integrated Report





2025
Green Bond Report

Please click here for ADCB's ESG-related disclosures

Foundations for long-term value creation

Disciplined governance & risk culture

- Board-approved risk appetite statement defining risk tolerance and guiding governance, strategy and disciplined decision-making
- ‘Three lines of defence’ framework with clear ownership, effective challenge and independent assurance
- Evolving risk governance for a digital era, embedding AI governance and model risk controls into the enterprise framework

Balance sheet strength

- Domestic Systemically Important Bank (D-SIB) with scale that supports resilience
- Diversified funding base across deposits and capital market instruments, supported by active balance-sheet management
- Prudent liquidity and portfolio governance, strengthened by enhanced analytics and scenario-based oversight

Scalable, diversified franchise

- Diversified customer base spanning individuals, SMEs, corporates and government entities
- Balanced business model across Retail, Corporate & Investment Banking, Wealth and Treasury platforms
- Subsidiaries extending reach, supported by Al Hilal Bank, ADCB Egypt and Meedaf strengthening the Group’s presence through diversified propositions

Technology & AI-led operating model

- AI is being embedded at the core of the business model, with dedicated leadership and an at scale transformation roadmap
- Strategic partnerships accelerating delivery, including collaboration with Microsoft and G42, alongside the rollout of AI tools supporting governance, credit and compliance
- Digital-first execution, supported by a cloud-based platform and increasing self-service and automation

Talent & culture

- High-performance culture anchored in ADCB values: integrity, respect, care, discipline and ambition, underpinned by strong leadership capability and execution discipline
- Emiratisation as a strategic priority, embedded across the Group’s talent strategy and supported by structured development pathways
- Developing future-ready skills across the workforce, including learning initiatives to strengthen AI and digital fluency

Integrated sustainability approach

- Sustainability incorporated into strategy with senior management accountability and Board-level oversight
- Responsible lending and Environmental & Social Risk Management (ESRM) embedded into decision-making and risk frameworks
- Sustainable finance capability and transparent disclosures, aligned with global standards and evolving regulatory expectations

About ADCB

Our business segments

- Retail Banking Group
- Corporate & Investment Banking Group
- Private Banking & Wealth Management Group
- Treasury & Investments Group

UAE-centric focus with selective international presence

40	50	3	2
ADCB UAE branches	ADCB Egypt branches	Al Hilal Bank UAE branches	ADCB Kazakhstan branches

Our key subsidiaries

Our vision

To be the number one bank of choice in the UAE.

Our mission

To build partnerships with customers that last a lifetime by acknowledging every customer as an individual, offering innovative products and unparalleled service.

Our strategic goal

To deliver sustained, profitable growth to create long-term benefits to stakeholders.

Our values

- Integrity
- Respect
- Care
- Discipline
- Ambition

Key 2025 highlights

January

- Launched a new five-year strategy aligned with the UAE's long-term economic ambitions, targeting a doubling of net profit
- Included in the FTSE4Good Index for strong ESG performance
- Achieved 100% Emiratisation across all banking roles in Al Ain

March

- Upgraded by S&P Global to A+ for ADCB's long-term credit rating, reflecting strong financial fundamentals and asset quality

April

- Recognised as the UAE's strongest banking brand for the second consecutive year by Brand Finance, with brand value increasing 17% YoY to AED 12.3 bn

June

- Meedaf and Brink's formed a strategic alliance to revolutionise cash and ATM operations in the UAE

July

- ADCB marked its 40th anniversary through a series of initiatives celebrating four decades of progress and impact

August

- Certified by the UAE Central Bank to participate in Al Tareq and completed the Bank's first live open finance transaction

September

- Meedaf and InDebted formed a strategic partnership to transform debt resolution in the UAE

October

- Launched an enterprise-wide AI-led transformation to embed artificial intelligence at the core of the Bank's operating model and strategy
- Received the Nafis Diamond Award for exceptional achievements in Emiratisation

November

- Achieved a Guinness World Record for creating the largest biodegradable material mosaic flag
- Published climate targets for the power and oil and gas sectors

December

- Successfully completed AED 6.1 bn rights issue, attracting strong investor demand and representing the largest transaction by a company with a primary listing on ADX
- Secured leading ESG ratings from major global sustainability rating agencies
- Zayed International Airport introduced TouchPoints as its exclusive loyalty programme

ADCB at a glance



Profit before tax
AED 12.843 bn
+21% YoY

Nationalities represented within the bank
80+

Customers registered on digital platforms[1]
93%

Third-largest bank by total assets in the UAE
AED 774 bn
+19% YoY

Emirati employee base
c.40%

RoAE (post-tax)
15.3%
+180 bps YoY

CET1 ratio
13.79%
+123 bps YoY

Total number of retail customers[1]
2.2 mn+

(1) ADCB UAE only, excluding Al Hilal Bank

Supporting the UAE's transition to a sustainable, inclusive future



From climate commitment to implementation

In 2025, the UAE advanced from long-term climate pledges to the implementation of its net-zero vision. The year marked the entry into force of Federal Decree-Law No. (11) of 2024 on Climate Change[1], along with the linked Cabinet Resolution[2]. The law provides a unified framework to deliver the UAE's Net Zero by 2050 strategy, with the aim of managing emissions, building capabilities, improving emissions data, and aligning with national plans and strategies with climate mitigation and adaptation objectives.

Under the new law, a National Register for Carbon Credits[2] will enable transparent tracking of verified carbon credits and offset projects, along with reporting obligations for large emitters and a common methodology for greenhouse gas measurement across the economy.

Alongside this, the National Climate Adaptation Action Plan[3] aims to strengthen national resilience across multiple sectors, including infrastructure, water management, agriculture and health. It is supported by research partnerships between national universities and international organisations to enhance climate data and modelling.

Meanwhile, federal entities have been progressing with sectoral decarbonisation plans aligned with the Third Nationally Determined Contribution (NDC 3.0), reaffirming the goal of a 47% reduction in national emissions by 2035, from a 2019 baseline.

Accelerating the energy transition

Energy transition efforts have accelerated over the past year. The UAE remains on course to achieve its targets of 30% clean energy generation by 2030, tripling the contribution of renewable energy over the same timeframe[4]. Solar energy expansion continues across the emirates, while the Barakah Nuclear Energy Plant[5] is fully operational in Abu Dhabi, generating 40 Terawatt-Hour (TWh) annually, equivalent to approximately a quarter of the nation's electricity needs.

At the same time, the government continues to explore technologies like Carbon Capture and Storage (CCS) and electrification within high-emitting sectors as part of its decarbonisation commitments and the National Hydrogen Strategy 2050 sets out plans to strengthen the UAE's position as a producer and supplier of low-emission hydrogen.

Mobilising sustainable finance

Sustainable finance is a cornerstone of the UAE's energy transition, enabling the shift towards a low-carbon and resilient economy. The country's banking sector continues to lead regionally in aligning capital flows with the Net Zero by 2050 strategy. The UAE Banks Federation (UBF) provides quarterly progress updates on the collective AED 1 trillion sustainable finance pledge by 2030, reaffirming the industry's commitment to the national net zero pathway.

Demonstrating its commitment to tangible climate action, the UAE's Sustainable Finance Working Group (SFWG) launched a public consultation in June 2025 on draft principles for climate transition planning, marking the next step in efforts to strengthen the country's sustainable finance ecosystem[6]. These principles came into force in March 2026.

(1) Federal Decree-Law On The Reduction Of Climate Change Effects
(2) Cabinet Resolution Concerning The National Register For Carbon Credits
(3) National Climate Adaptation Action Plan
(4) UAE Energy Strategy 2050
(5) Barakah Nuclear Energy Plant
(6) UAE Sustainable Finance Working Group (SFWG) principles for climate transition planning

Sector decarbonisation targets as per UAE's climate commitments (NDC 3.0)

Sector[1]	2019 base year in $MtCO_2e$	Target $MtCO_2e$ by 2035	Reduction by 2035
Industry	92.6	68.0	27%
Transport	30.2	24.2	20%
Waste	4.8	3.0	37%
Buildings	71.0	15.0	79%
Agriculture	4.2	2.6	39%

UAE's 2035 emission reduction target

47%

(reduction in national emissions by 2035, from a 2019 baseline)

In July 2025, the CBUAE also issued a Climate-related Financial Risk Management Regulation[2], which aims to ensure financial institutions implement appropriate governance and risk management processes to identify and manage climate-related financial risks.

Social progress and inclusion

Reflecting the emphasis on shared prosperity, the UAE designated 2025 as the 'Year of Community' to promote volunteering and strengthen collaboration across government, business and wider society. As part of the Year of Community, His Highness Sheikh Mohammed bin Rashid Al Maktoum, Vice President and Prime Minister of the UAE and Ruler of Dubai, launched the UAE Volunteering and Community Engagement System. This is a national programme to expand the country's volunteer base to 600,000 and support not-for-profit organisations.

The initiative aims to increase the number of such organisations by 30%, through a single-service digital portal, community project incubators, and an AED 100 million (USD 27.2 million) support fund. The programme also complements the objectives of the social investment fund of the National Authority of Social Contribution – Ma'an, which leads multiple initiatives to support youth employment, social entrepreneurship and well-being programmes across the country.

Building a stronger society

The UAE continues to advance its social protection framework. The National Human Rights Institution (NHRI), established in 2021, continues to promote and protect human rights in the UAE through channels such as legislation, partnerships and educational programmes.

NHRI launched its operational plan in 2025[3], which focuses on 34 human rights programmes, including a 'Legislation Lab' and a 'Knowledge Lab', as well as the formation of specialised committees to conduct field visits and deliver workshops in collaboration with key national entities.

Gender equality is an important aspect of social progress. Women hold 50% of seats in the Federal National Council[4] and the UAE rose five places in the WEF Gender Gap Report 2025 to 69th, ranking 1st in the region and 1st globally for female enrolment in education and representation in parliament[5]. Initiatives such as Nafis, the UAE's National Program for Emirati Human Resources Development, and UAE Women's Leadership Program are continuing to advance female participation in key sectors.

One year after the announcement of the Mental Health Law[6], developments in the UAE's mental health landscape are showing a clear shift towards more integrated, accessible care. The Dubai Health Authority (DHA) adopted new standards aligning mental health services with global practices[7], while Emirates Health Services launched 15 specialised mental-health clinics across six emirates[8]. On the digital front, the 'Nafas' mental-health platform was launched to provide virtual therapy, 24/7 chat support and multilingual content for patients in Abu Dhabi[9].

Education and skills development remain national priorities. The national education strategy aims to embed sustainability and digital capability within the curriculum, while green-skills programmes prepare graduates for emerging roles in energy transition and circular economy sectors[10]. Similarly, initiatives like the UAE's partnership with the International Renewable Energy Agency (IRENA) in the NewGen Renewable Energy Accelerator are helping to nurture a new generation of sustainability entrepreneurs and start-ups.

Strengthening governance and resilience

The regulatory environment in the UAE continued to evolve at a pace in 2025, with the Central Bank of the UAE (CBUAE), the Capital Market Authority (CMA) and the Higher Shari'ah Authority issuing a series of new notices and thematic reviews. Regulators also intensified enforcement activity, with the CBUAE issuing public actions across multiple banks, exchange houses and insurance companies during the year. The year also saw heightened supervisory focus on financial crime prevention following the country's removal from the Financial Action Task Force (FATF) grey list in early 2024. At the same time, the UAE's financial sector is preparing for the FATF Mutual Evaluation scheduled for 2026, prompting closer scrutiny of governance, control, and risk management frameworks.

Against this backdrop, the Corporate Tax regime, fully implemented this year, strengthens the UAE's fiscal sustainability and economic diversification. In addition, the Abu Dhabi Securities Exchange (ADX) published new guidance for sustainability disclosures for listed companies in line with IFRS S1 and S2 standards[11], enhancing transparency and investor confidence, and reinforcing the UAE's reputation as a well-regulated and trusted jurisdiction.

(1) Individual sector emissions include emissions from power and water usage. The NDC 3.0 aims to deliver a 50% reduction in emissions from power and water driven through each of the sectors
(2) Climate-related Financial Risk Management Regulation issued by CBUAE
(3) Operational plan for National Human Rights Institution (NHRI)
(4) Federal National Council of the UAE
(5) Global Gender Gap Report
(6) Mental Health Law
(7) Dubai Health Authority (DHA) adopted standards on mental health services
(8) Mental health clinics launched by Emirates Health Services
(9) Nafas' mental health platform
(10) Green Education Partnership Roadmap
(11) ESG disclosure guidance for listed companies

Message from the Group CEO



Sustainability is a strategic differentiator for ADCB, with the Bank recognised among the UAE's highest-rated financial institutions by leading international ESG agencies.

ADCB's sustainability agenda is shaped by the Bank's role in supporting the UAE's long-term economic priorities and the increasing focus on measurable progress. We continue to contribute through capital mobilisation, stronger governance and disciplined execution, with our sustainable finance portfolio reaching AED 71.9 billion in 2025, exceeding our AED 50 billion target and advancing towards our AED 125 billion ambition by 2030. This progress reflects increasing demand from corporate and institutional clients and reinforces ADCB's role in enabling responsible, future-focused growth.

In parallel, Emiratisation remains central to ADCB's long-term success, with UAE nationals representing approximately 40% of our workforce. By investing in Emirati talent, we are strengthening the future leadership of the Bank and contributing to the depth and resilience of the UAE's financial sector.

As a leading Domestic Systemically Important Bank, ADCB remains firmly committed to advancing the UAE's long term priorities by directing capital with purpose, strengthening institutional resilience through disciplined execution, and creating enduring value for our customers, our shareholders and the wider economy. Building on this foundation, we will continue to harness innovation, including AI, to strengthen governance, accelerate measurable ESG progress, and reinforce our role in contributing to a more resilient, future ready financial sector.

Ala'a Eraiqat
Group Chief Executive Officer

ADCB's 5-year strategy for a sustained pace of growth

Core engine

Corporate & Investment Banking Group

Scale geographically, expand into new segments, launch innovative product offerings

Retail Banking Group

Digitalise, hyper-personalise propositions, build partnerships and ecosystems

Private Banking & Wealth Management Group

Expand geographically, augment product suite, future proof service models

Treasury & Investments Group

Augment offering, revamp funding/risk strategy

New bold moves

ADCB Egypt

Boost corridor banking, launch new products and services

Al Hilal Bank

Build innovative partnerships, drive operational efficiency

Meedaf

Provide specialised solutions to streamline operations, strengthen security and enhance customer experience

Create additional revenue streams

Explore carve outs, partnerships and investment to create new business opportunities

Cross-cutting themes

1. **Accelerate digital transformation and deploy AI** at scale by driving value-led innovation across AI, digital assets, and cybersecurity and cyber resilience
2. **Embed efficiency in the organisational DNA** by institutionalising pan-bank efficiency programmes focused on minimising costs (operational and funding), maximising revenue and elevating customer experience
3. **Grow talent brand and become an industry leader** by instilling a culture of superior value creation and distinctive entrepreneurship while building a hub for Emirati talent
4. **Reinforce risk and compliance** by enabling a risk-empowered culture powered by advanced analytics to foster healthy and balanced growth
5. **Drive ESG leadership**, reinforcing commitment to best practice governance, social responsibility and support for the UAE's Net Zero strategy

Accelerate growth of the core businesses

Corporate & Investment Banking Group

The Corporate & Investment Banking Group (CIBG) will build broader banking relationships across a growing client base. The Bank is enhancing its client engagement network for financial market solutions and capital markets products for corporates.

ADCB is also playing an increasing role in supporting clients operating across regional economic corridors, leveraging its strong presence in the UAE, Egypt and Kazakhstan. In parallel, the Bank is accelerating its working capital proposition with a focus on current and savings accounts (CASA) and transaction banking, while remaining fully committed to serving the small and medium enterprise (SME) segment through an enhanced digital proposition.

Retail Banking Group

The Retail Banking Group (RBG) aims to further strengthen its position as the retail 'bank of choice', continuously delivering new innovative products and services to meet the ever-growing needs of customers.

The Bank will strengthen its focus on the high value segments as well as fast-growing Islamic market, launching tailored propositions to all customers, with a particular focus on Emiratis. The Bank is also committed to growing the micro-business landscape in the UAE and will act as the growth partner for these businesses, supporting their aspirations and offering a platform to address all their needs.

ADCB will continue to spearhead customer centricity, evolving its sales and service model to become digital-first, harness the power of data and artificial intelligence (AI) to offer hyper-personalised experiences, and differentiate through new innovations such as open banking.

Private Banking & Wealth Management Group

The Private Banking & Wealth Management Group is a key growth area for ADCB. The Group's vision is to further deepen its local presence offering distinct propositions, while continuing to develop a client-centric relationship model, designed to meet the needs of an expanding client base. To achieve this ambitious goal, ADCB is building a differentiated product offering by enhancing investment products and services and establishing unique partnerships with leading global asset managers.

Treasury & Investments Group

The Treasury & Investments Group will continue to enhance sophistication to support ADCB Group's funding, investments, and centralised risk management activities. This includes diversifying the trading desk into new areas such as ETFs and commodities, and expansion of the investment desk into a broader suite of products.

The Asset-Liability Management function will further enhance the Bank's fund transfer pricing mechanism to support stable and cost-effective funding sources, effectively manage and mitigate interest rate risk, while also reviewing the bank's long-term funding plans to manage the cost of funds. For clients, the Treasury function will also work with Retail, Corporate and Private Banking to revamp value chain coverage and scale up the foreign exchange and derivatives sales business.



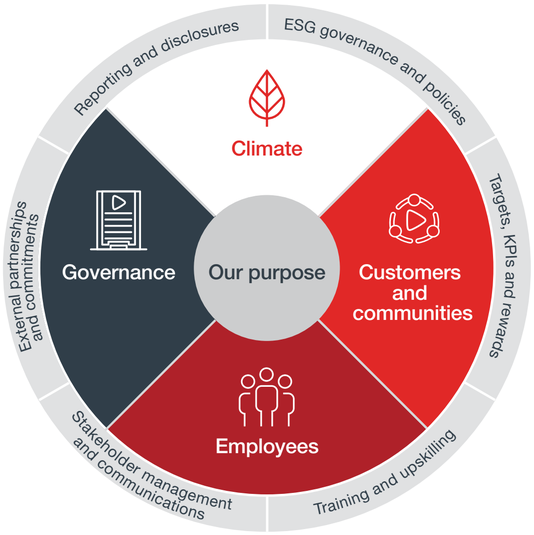
ADCB's approach to sustainability

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ADCB's integrated approach to sustainability

ADCB sustainability strategy

ADCB's sustainability strategy is based on a double materiality assessment informed by the requirements of the Global Reporting Initiative (GRI) and the IFRS Sustainability Reporting Standards. This strategy comprises four pillars (Climate, Employees, Governance, Customers & Communities), and each pillar consists of four workstreams most material to the Bank.



For more information on our ESG priorities, please visit **adcb.com/esg**

ESG as a key strategic differentiator

Sustainability is fully integrated into the Bank's overall corporate strategy, with the delivery of key milestones directly linked to the executive remuneration for the Group CEO and Group CFO. The annual ESG roadmap detailing the key milestones is approved by the Group Sustainability Committee and monthly progress is reported to the Core Strategy Steering Group (chaired by the Group CEO), providing senior-level oversight throughout the year.

In addition, the Board-approved Group Risk Appetite Statement (RAS) includes sustainability targets, with progress reported at regular intervals to the Board Risk Committee (BRC) and the Risk Management Committee (RMC). This robust governance approach ensures sustainability is embedded into the Bank's core business strategy.

Leading position in ESG ratings among banks in the region

During the year, ADCB achieved leading positions across major environmental, social and governance (ESG) ratings including: S&P, MSCI, Sustainalytics and Bloomberg, underscoring the Bank's progress in environmental and social risk management, sustainable finance, human capital development, business ethics, data privacy, cybersecurity and consumer financial protection.

In 2025, ADCB maintained its MSCI rating of AA, a low-risk rating with Sustainalytics, scoring 14.6. ADCB's FTSE Russell ESG score was upgraded from 3.7 to 4.0, driven by a 100% score in Governance and an improvement in the Social score. Furthermore, S&P Global ESG rating improved from 38 to 59 out of 100, underpinned by strengths in areas such as data privacy and security, sustainable finance, business ethics and tax transparency. ADCB also achieved a significant increase in its Bloomberg score, from 2.73 in 2023 to 6.74 in 2025.

MSCI

Joint 1st in UAE

A	AA
2023	2025

Latest rating Oct'25: AA ('Industry Leader')

AAA	AA	A	BBB	BB	B	CCC
Leader		Average			Laggard	

SUSTAINALYTICS

1st in UAE and awarded 'Regional Top Rated' badge

31 "High risk"	14.6 "Low risk"
2022	2025

Latest rating Sep'25: 14.6 ('Low Risk')

Negligible (0–10)	Low (10–20)	Medium (20–30)	High (30–40)	Severe (+40)
Best				Worst

Bloomberg

1st in UAE, 4th globally

2.73	6.74
2023	2025

Latest rating Nov'25: 6.74

10 — 0

S&P Global

1st in UAE

38	59
2022	2025

Latest rating Dec'25: 59

100 — 0

ADCB sustainability strategy

Purpose — Support the transition to an inclusive, net zero economy

Strategic priorities	Climate	Customers and communities	Employees	Governance
Ambition	Support the transition to a net zero economy and manage climate change risks	Provide inclusive and innovative financial services to drive sustainable economic growth	Create a thriving workplace that attracts and retains the most talented and committed people	Operate a responsible business with the highest ethical standards to preserve integrity and trust
Workstreams	1.1 Aligning portfolios and reducing financed emissions 1.2 Environmental and social risk management (ESRM) 1.3 Sustainable finance 1.4 Operations and supply chain	2.1 Customer satisfaction 2.2 Financial inclusion 2.3 Digital and innovative propositions 2.4 Community investment	3.1 Employee engagement and well-being 3.2 Emiratisation 3.3 Learning and development 3.4 Equality, diversity and inclusion	4.1 Corporate governance, compliance and code of conduct 4.2 Risk management and cybersecurity 4.3 Financial crime, anti-bribery and corruption 4.4 Tax transparency
Commitments	› **Commit to lend, invest and facilitate AED 125 billion (USD 34 billion) by 2030** to sustainable activities › **Launch new products and services** to support customers in their transition › Commit to **net zero in own operations, and to reducing financed emissions** in line with the UAE government's net zero ambition	› **Enhance experience and create value for money** for customers, whilst improving access to financial products › **Digital initiatives** to drive mobile banking penetration among new and existing customers	› Continue to improve **diversity and inclusion metrics**, and maintain best in class employee satisfaction › **Enhance employee learning** through **high-quality content** and **dedicated training**	› **Drive best-in-class** governance in the region, and continue to enhance ethical banking practices › **Maintain industry-leading** data privacy and information security

SUSTAINABLE DEVELOPMENT GOALS

Enablers

ESG governance and policies | Targets, KPIs and rewards | Training and upskilling | Stakeholder management and communications | External partnerships and commitments | Reporting and disclosures

A conversation with Deepak Khullar, Group Chief Financial Officer, and Richard Hirst, Executive Head of Sustainability



DEEPAK KHULLAR | Group Chief Financial Officer

RICHARD HIRST | Executive Head of Sustainability

How do you see sustainability supporting the Bank's long-term value creation?

Deepak Khullar: When we began our sustainability journey several years ago, the focus was on building the right foundations. Today, we are seeing the benefits translate into real outcomes for the Bank, from business origination and risk management, to attracting long-term investment.

Client demand continues to grow, reflected in our sustainable finance portfolio reaching AED 72 billion by the end of 2025, well ahead of our interim target and firmly on track toward our AED 125 billion ambition by 2030.

At the same time, embedding sustainability into decision-making, governance and risk management has helped us stay ahead of rapidly evolving regulatory expectations. This disciplined approach has also strengthened our market position and supported our best-in-class ESG ratings, contributing to increased interest and allocations from ESG focused investors.

At a time when some global banks are stepping back, why has ADCB maintained and strengthened its climate commitments?

Richard Hirst: As our climate strategy has developed, we have continued to take a measured and consistent approach. This aligns with the UAE's clear policy direction, underpinned by the Federal Climate Law, and Central Bank requirements, as well as ESG reporting guidance from the Abu Dhabi Securities Exchange, informed by the IFRS standards.

In 2025, we reached a major milestone with the publication of our first public climate targets for two of our most impactful sectors - power and oil & gas. We have also implemented a climate transition assessment framework to guide our engagement with clients and support their transition. These targets are designed to be realistic and credible, reflecting client commitments and the UAE's latest climate ambitions set out in its Nationally Determined Contribution - NDC 3.0.

What is ADCB's approach to governing and implementing its sustainability strategy across the Group?

Deepak Khullar: Governance is at the core of how we consistently drive the implementation of sustainability initiatives across the Group.

We have put in place clear oversight at both Board and management levels. At the Board level, the Board Executive Committee oversees strategy, including climate targets, while the Board Risk Committee ensures that sustainability is reflected in our risk appetite and stress testing.

At management level, our ambitions are translated into a clear roadmap overseen by the GCEO-led Core Steering Group and the Group Sustainability Committee, which I chair. Together, they set the ESG priorities and KPIs, with executive remuneration aligned to these objectives to support consistent delivery across the organisation.

What is driving ADCB's leading position across international ESG ratings?

Richard Hirst: Our ESG performance reflects sustained efforts over several years, rather than the result of any single initiative. We have consistently focused on strengthening the fundamentals - particularly governance, risk management and transparency - and these actions have gradually come together in how the Bank is assessed externally.

This has included enhancing our data privacy and cybersecurity practices in line with ISO standards, integrating climate risk into our operating and risk frameworks, and building on foundational policies such as our Human Rights Position Statement.

These combined actions are reflected in our ESG ratings, where we are recognised among the top rated banks in the region, while also receiving industry recognition such as the 'Best ESG and Sustainability Report' - Large Cap' award from the Middle East Investor Relations Association.

How is ADCB incorporating ESG and climate considerations within its broader risk framework?

Deepak Khullar: ESG and climate risks are no longer limited to credit alone. They now extend across operations, market and liquidity, and reputational risk, as these risks become more visible in the real economy.

Last year, we incorporated climate risk into our Internal Capital Adequacy Assessment Process, supported by short and long-term stress testing across key sectors. This goes beyond regulatory requirements and it has strengthened how we assess the impact of transition and physical risks on credit quality, asset values and overall portfolio resilience.

What are your sustainability priorities for 2026?

Richard Hirst: Looking ahead, ADCB will continue to align its sustainability priorities with value creation and measurable outcomes. In practice, this means further integration of sustainability into corporate strategy, financial decision-making and risk management across the Bank.

Advancements in data and AI capabilities will play an important role in enhancing transparency, supporting efficient reporting, and meeting increasingly complex disclosure expectations.

We will also maintain a strong focus on social impact, with continued emphasis on Emiratisation, developing national talent, and deepening our engagement with the communities we serve.

2025 sustainability performance highlights

ADCB Group has established a comprehensive set of key performance indicators to measure progress against the sustainability objectives. In 2025, the Bank continued to make significant progress in each of the four strategic pillars. Further information on our performance on key ESG metrics can be found in the 'Data and assurance' section.

Climate

Total green assets compared to liabilities[1]
2.9x

Total operational GHG emissions[2][3]
25,528 tCO_2e

Sustainable finance portfolio
AED 71.9 bn[2]
58% progress towards AED 125 bn target

Total absolute financed emissions[2][4]
15.8 million tCO_2e

Customers and communities

Decrease in customer complaints[5]
9%

Net Promoter Score (NPS)[6]
80

New services launched through mobile and internet banking
15

In-Country Value (ICV) score for ADCB UAE
68.9%

Employees

Emiratisation rate[7]
c.40%

Training hours for UAE nationals
140,000+

Global ranking in 2025 Organisational Health Index (OHI) survey
Top quartile

Female employees
44%

Governance

Employees trained on data privacy and protection[8]
96%

Monetary losses as a result of legal proceedings associated with non-ethical business practices[9]
Zero

Sustainalytics risk rating on data privacy and cybersecurity
Top 3rd percentile
Among global and regional banks

Percentage of workforce formally trained on the anti-bribery/corruption[10]
100%

(1) In 2025
(2) Verified by third-party auditor
(3) Total of Scope 1, 2 and 3 GHG emissions from operational activities in ADCB Group (including our subsidiaries in Egypt and Kazakhstan)
(4) Reported for ADCB UAE as at 31 Dec 2024
(5) Reported for ADCB Group. Based on the comparison of 3-year rolling average of customer complaints for the reporting year when compared to the previous reporting period
(6) Reported for ADCB UAE only
(7) Reported for ADCB and AHB in the UAE excluding non-financial entities such as ITMAM, ADCE and outsourced employees. Emiratisation rate is calculated as the percentage of Emirati nationals (with a family book) within the total full time employees in ADCB UAE and AHB UAE
(8) Reported for ADCB Group (excluding ADCB Egypt and ADCB Kazakhstan)
(9) Reported as total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations for ADCB Group
(10) Reported as Code of Conduct training for all employees (incorporating anti-bribery and corruption content) and targeted ABC training for new hires as part of induction program

Sustainability governance framework

ADCB employs a best practice governance framework, with full Board oversight and executive accountability, including executive remuneration linked to ESG KPIs.

Board Executive Committee (BEC) is the supervisory Board level committee, responsible for overseeing the Bank's direction as well as endorsing and monitoring progress on climate-related initiatives. The BEC is responsible for reviewing and approving the recommendations to the Board on the ESG strategy, business plan and targets.

The BEC is periodically updated on the implementation of the Sustainability strategy, any budget approvals for Sustainability initiatives, progress against the targets and any other activity as clearly defined in the terms of reference of the **Group Sustainability Committee (GSC)**.

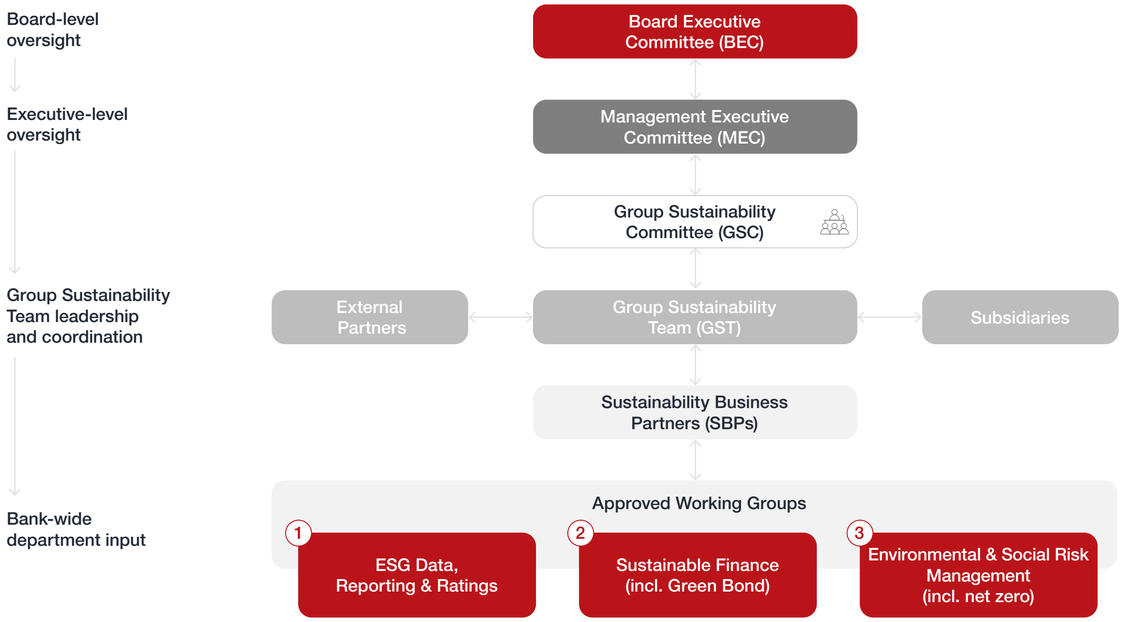
The BEC received the following key updates on sustainability in 2025:

- Quarterly updates on sustainability initiatives linked to the corporate strategy (including updates on climate initiatives)
- Annual update on progress against ADCB's sustainability strategy
- Awareness session on key ESG market trends and updates
- Updates on ESG strategic priorities in line with the corporate strategy
- Endorsement of climate targets

All sustainability initiatives are monitored by the GSC, which is chaired by the Group Chief Financial Officer. The GSC provides regular updates to the **Management Executive Committee (MEC)** and to the Core Strategy Steering Group.

ADCB Group Sustainability Governance Framework

The Bank has established a comprehensive governance framework to ensure coverage across the Group and three working groups directly focused on delivering the ESG priorities.



GSC members:

- Group Chief Financial Officer (Chair)
- Group Chief Risk Officer
- Group Chief Compliance Officer
- Group General Counsel
- Group Chief Credit Officer
- Group Chief Operating Officer
- Group Chief Human Resources Officer
- Group Chief Corporate, Wealth, and Investment Banking Officer
- Group Head, Private Banking and Wealth Management
- Group Chief Retail Banking Officer
- Group Treasurer
- Executive Head, Sustainability (Secretary)

GSC invitees:

- Group Chief of Staff & Organisational Effectiveness
- Group Company Secretary
- Senior Head, Financial & Strategic Engagement
- Executive Head, Credit Risk Management

Key ESG governance highlights

- GCEO, GCFO, and the GCRO remuneration linked to ESG KPIs
- Appointed Sustainability Business Partners across all departments and subsidiaries
- Designated Group Sustainability Team reporting to Group CFO and integrated in the Finance team
- GSC Terms of Reference approved by the GCEO-led MEC
- Three approved working groups aligned with the sustainability priorities as per the corporate strategy
- Reporting of progress against key metrics aligned with the sustainability priorities

2025 key topics discussed at GSC(1)

- 2025 sustainability roadmap
- Group Sustainability Committee (GSC) Terms of Reference (ToR)
- Climate targets
- ESG-related policies
- UAE Climate Law
- Sustainable finance target progress
- ESG reports and ratings disclosures
- 'Year of Community' initiatives
- ADCB Group Sustainable Product Framework
- 2025 Green Bond Report
- Sustainability Risk Appetite Statements (RAS)
- Environmental Social and Risk Management (ESRM) monitoring and progress
- Participation in industry-wide climate initiatives

(1) Six meetings were held by the Group Sustainability Committee in 2025

Governance of subsidiaries

In 2025, the Group Sustainability Team (GST) reviewed the annual KPIs for ADCB Egypt's sustainability team to ensure alignment with the Group's strategic priorities. Collaboration focused on advancing key initiatives such as the annual ESG report, financed emissions reporting, setting targets to expand green finance offerings, and reducing resource consumption.

The Group Sustainability Team also worked with ADCB Kazakhstan (ADCBK) in advancing its ESG agenda, by supporting the development of an ESG governance framework and implementation of local Environmental & Social Risk Management (ESRM) policies.

Management of sustainability within Al Hilal Bank is led by the Group Sustainability Team, with guidance on reporting, regulatory requirements, training and strategic initiatives, such as Islamic Sustainable Finance.

Sustainability business partners

Sustainability Business Partners (SBPs) play a critical role in the success of the Group's sustainability strategy, coordinating activities related to the launch of key initiatives across each of the business departments and subsidiaries across ADCB Group.

ADCB has increased engagement around its ESG priorities by holding briefing sessions with SBPs after each Group Sustainability Committee meeting to raise awareness and disseminate key sustainability updates across the organisation.

Approved Working Groups

1 ESG Data, Reporting & Ratings

The ESG Data, Reporting, and Ratings Working Group is responsible for assessing the disclosure requirements to stakeholders such as regulators, the government, rating agencies and investors. It also manages end-to-end data capture, consolidation, and third-party assurance, as well as identifying and proposing performance improvements.

This working group leads the Bank's engagement with rating agencies as set out in the annual disclosure plan. It is also responsible for updating the basis of reporting, and developing capabilities and awareness in preparation for adoption of IFRS standards.

2 Sustainable Finance (incl. Green Bond)

The Sustainable Finance Working Group is tasked with reviewing and updating the ADCB Green Bond and Sustainable Product Frameworks, obtaining a second party opinion, approving the eligible green loan and sustainable finance portfolios, monitoring progress against ADCB's sustainable finance target, producing the allocation of green bond net proceeds, and ensuring ongoing compliance.

The Group also oversees impact reporting with third-party assurance, as well as the development of green bond documentation.

3 Environmental & Social Risk Management (incl. net zero)

The ESRM Working Group provides oversight of the ESRM framework, updates to the ESRM Policy and its implementation across the business. The Group monitors regulation, best practice and industry expectations to propose any modifications required to the framework.

This Working Group also includes oversight of ADCB's progress against climate targets and the implementation of key initiatives as part of the Bank's net zero transition plan.

Executive Management remuneration, incentives and KPIs

Sustainability is embedded at the heart of ADCB's performance management framework, with Management Executive Committee's remuneration linked to ESG KPIs. These include:

- Sustainability strategy milestones (included in the GCEO and GCFO's KPIs)
- Compliance and risk metrics
- Emiratisation targets
- Digital index
- Customer Net Promoter Score (NPS)
- Organisational Health Index (OHI)
- Risk Appetite Statement (including Sustainability targets) linked to the GCEO and GCRO's remuneration

Reporting and disclosures

ADCB is committed to transparent disclosure of ESG performance in line with global standards and evolving regulatory requirements, including the IFRS sustainability (S1) and climate-related (S2) requirements issued by the International Sustainability Standards Board (ISSB).

ADCB's disclosures are informed by the following reporting standards and guidelines:

Capital Market Authority (CMA)
Sustainability Disclosure Requirement

Abu Dhabi Securities Exchange (ADX)
ESG Disclosure Guidance for listed companies

Central Bank of the UAE (CBUAE)
'Principles for sustainability-related disclosures for reporting entities'

Global Reporting Initiative (GRI)
Standards

Sustainability Accounting Standards Board (SASB) Industry Standards for the financial sector(1)

IFRS Sustainability Disclosure Standards

- IFRS S1 General requirements for Disclosure of Sustainability-related Financial Information
- IFRS S2 Climate-related Disclosure Standard (aligned to the Task Force on Climate-related Financial Disclosures (TCFD) recommendations)

ADCB's Green Bond Report is aligned with the **International Capital Market Association (ICMA)** Green Bond Principles

Green bond impact and allocation reporting

ADCB's 2025 Green Bond Report provides details on ADCB's:

- Eligible Green Loan Portfolio (EGLP)
- Allocation of proceeds to the EGLP
- Estimated environmental impacts

Aligned with the ADCB Green Bond Framework and the International Capital Market Association's (ICMA) Green Bond Principles, the report highlights the Bank's financing of projects in renewable energy, green buildings, energy efficiency, pollution prevention, sustainable water and wastewater management.



2025
Green Bond Report



Sustainability policies and frameworks

The Bank has issued an updated Group Sustainability Policy covering the general principles and commitments linked to ADCB's sustainability strategy. This is supplemented with topic-specific and sectoral policies, operating procedures, and guidelines to support effective implementation across the organisation, including our subsidiaries.

Policies or statements updated or published in 2025

- ADCB Group Environmental and Social Risk Management Policy
- ADCB Environmental Statement (covering operations)
- ADCB Group Responsible Marketing Statement
- ADCB Group Human Rights Position Statement
- ADCB Group Sustainable Product Framework

SPOTLIGHT

Awarded Best ESG Report in Middle East

In September 2025, ADCB's 2024 ESG Report was recognised as a benchmark for excellence, winning the prestigious **'Best ESG and Sustainability Report - Large Cap'** award at the Middle East Investor Relations Association (MEIRA) Conference held in Oman. This underscores ADCB's commitment to best-in-class disclosures and transparent reporting practices, setting a high standard for sustainability disclosures in the region.

Other ESG-related policies











For other policies, please visit adcb.com/esg

(1) Incorporated as part of IFRS Sustainability Disclosure Standards

External partnerships and commitments

ADCB collaborates with strategic partners to advance its sustainability strategy. It regularly monitors and evaluates the market to expand its network of external partnerships on ESG topics to match its strategic priorities.

Key public commitments

UNITED ARAB EMIRATES MINISTRY OF CLIMATE CHANGE & ENVIRONMENT

UAE Ministry of Climate Change & Environment: Climate-Responsible Companies Pledge

Signatory to the 'Climate-Responsible Companies Pledge' and committed to measure GHG emissions, develop and disclose plans to reduce emissions

UN environment programme | finance initiative

UN Environment Programme Finance Initiative (UNEPFI) Guidance for climate target settings for banks

Adopted the UNEPFI Guidance for climate target setting for oil & gas and power sectors

اتحاد مصارف الإمارات UAE BANKS FEDERATION

UAE Banks Federation: UAE national banks' commitment of AED 1 trillion to sustainable finance by 2030

Committed to AED 125 billion to Sustainable Finance by 2030

Partnerships and memberships

Government-led initiative

- UAE Sustainable Finance Declaration – signatory
- Global Climate Finance Centre – knowledge partner
- Abu Dhabi Sustainability Group – member
- Abu Dhabi Corporate Social Responsibility (CSR) Committee – member
- UAE Majra (National CSR Fund) – Gold Impact Seal Winner
- Ma'an Authority of Social Contribution – strategic partnership

Academia

- Zayed University– mentoring students in sustainability projects
- Emirates Institute of Finance (EIF) – Executive Sustainability Leadership Programme
- University of Cambridge–Institute for Sustainable Leadership

Industry-led initiative

- UBF Sustainable Finance Committee – member
- UAE Chief Sustainability Officers Network – member

NGO-led initiative

- Frontier25 (formerly UAE Independent Climate Change Accelerators – UICCA) – member

Training and upskilling

The Bank regards training and development as an essential element in the successful execution of its Group sustainability strategy. There are three levels of in-house training for employees:

Foundational: Introductory training at all levels to raise awareness of ESG. This includes ESG content within the Bank's induction programme and mandatory ESG e-learning for all employees.

Role-specific: Tailored training across all departments and Executive Management/Board-level aimed at building ESG knowledge as it relates to different roles.

Advanced: Specialist certificates or diploma courses with reputable universities or academies to provide employees with in-depth knowledge and skills on sustainability topics.

Total ESG learning hours[1]

16,000+

(1) Reported for ADCB Group

ESG capability building

During 2025, the in-house learning programme was significantly expanded with the roll out of an ESG training prospectus across the Bank.

Key courses in 2025 included role-specific training on:

- Introduction to Sustainability
- UN Sustainable Development Goals
- ESG Data and Reporting
- Green and Sustainable Finance

In addition, there are specialist courses with the Emirates Institute of Finance (EIF), Cambridge Institute of Sustainability Leadership (CISL), Corporate Governance Institute and other similar institutes.



Stakeholder engagement

Stakeholder engagement remains a key component of the Bank's success, driven by regular, proactive, and transparent communication. Working with stakeholders – including customers, investors, employees, government, and regulatory bodies – ADCB identifies and addresses key ESG topics that drive meaningful value creation for these groups.

Open dialogue continues to provide the Bank with a clear understanding of stakeholder expectations on a range of material issues and their impacts

How we engage

Stakeholder group	Examples of key ESG topics	Engagement	Response to stakeholders
Customers	Customer experience, ethical banking practices, fair pricing and product transparency, information security and data privacy	One-on-one meetings, customer surveys, newsletters, online and mobile banking, branch visits, social media, focus groups and customer contact centre	Enhanced service channels, improved product transparency
Employees	Health and well-being, training and skill development, employee engagement, code of conduct	Organisational Health Index, annual engagement surveys, internal communication through email and the intranet, and learning programmes	Implementation of feedback through training, wellness programmes and workplace improvements
Investors	Robust governance framework, Board independence and diversity, bank-wide policies, ESG disclosures, sustainable finance and adoption of environmental commitments	Quarterly disclosures including earnings press releases, investor presentations, annual reports, analyst and investor calls, one-on-one and group investor meetings, investor conferences and roadshows	Strengthened disclosures, governance practices, and integration of ESG priorities into the Bank's strategy
Government and regulators	Supporting the UAE's ambition to reach net zero by 2050, climate-risk assessment, helping to build a knowledge-based economy, Emiratisation and nurturing local talent, responsible AI adoption	Public disclosures (e.g., regulatory reporting), one-on-one meetings, consultations, forums and working groups	Alignment with national sustainability goals and compliance with evolving regulations
Suppliers	Sustainable procurement, supplier engagement, information security and data privacy, compliance with laws and regulations	Supplier registration, ESG vendor questionnaire, vendor code of conduct	Strengthened standards, ongoing monitoring

ESG related engagement with key stakeholders in 2025

- Corporate clients: 12
- Government and regulators: 5
- Investors: 39
- Industry associations: 6
- Universities and educational institutions: 10
- Non-governmental organisations (NGOs): 9
- ESG rating agencies: 8

Materiality assessment

In 2025, ADCB revalidated the results of the double materiality assessment completed in 2024 with the Group Sustainability Committee. The double materiality assessment is based on the requirements of the Global Reporting Initiative (GRI) Standards and the IFRS Sustainability Disclosure Standards.

Our assessment covered two dimensions:

GRI

Impact materiality

How do ADCB's activities impact:

- Environment
- Society
- Economy

IFRS Sustainability

Financial materiality

How sustainability (S1) and climate-related (S2) risks and opportunities affect ADCB's:

- Cash flows
- Access to finance
- Cost of capital

over the short, medium and long term

Double materiality assessment process

Stage	Key steps	Outputs
1 Identify potentially material sustainability topics	• Review ADCB's existing material topics against the latest global sustainability reporting standards, regulatory requirements and peer benchmarking	Long list of potentially material topics identified (initial assessment)
2 Identify Impacts, Risks and Opportunities (IROs) and assess impact and financial materiality	**Impact materiality** • Identify positive and negative impacts through the value chain (covering ADCB's supply chain, operations and products and services to customers) • Assess the magnitude and likelihood of impacts(1) **Financial materiality** • Identify risks and opportunities that affect ADCB's financial prospects (cash flows, cost of capital and access to finance) over the short, medium and long term • Assess the magnitude and likelihood of risks and opportunities(1) Stakeholder engagement: invited feedback from internal and external stakeholders on the impacts, risks and opportunities identified through surveys and workshops 70 internal stakeholders 29 investors 25 customers 31 suppliers	Preliminary list of material topics identified through impact and financial materiality assessments
3 Validate and finalise the list of material topics from impact and financial materiality assessments	• Finalise the assessment of IROs after incorporating stakeholder feedback • Identify the list of material topics above the set scoring threshold (for both impact and financial materiality) • Validate the material topics with the Group Sustainability Committee	Final list of material topics validated by Group Sustainability Committee

(1) Qualitative information and quantitative data (where available) were used to inform the assessment of Impacts, Risks and Opportunities (IROs)

List of material topics for ADCB

	Sustainability topic	Topic description	Impact materiality	Financial materiality		Double materiality
				Risk	Opportunity	
Environmental	Aligning portfolios and reducing financed emissions	Integrating climate considerations into investment and lending decisions to reduce financed emissions and support the transition to a low-carbon economy	○	●	●	●
Environmental	Sustainable finance	Providing products and services that drive positive environmental and social outcomes	○		●	●
Environmental	Environmental and Social Risk Management (ESRM)	Identifying, assessing, and managing environmental and social risks within financing activities	○	●		●
Environmental	Operations and supply chain	Minimising the environmental and social impacts of our own operations (through our offices, branches, use of IT and employee travel) and promoting sustainability practices across the supply chain	Not identified as material (impact and financial)			
Social	Customer satisfaction	Exceeding customer expectations through transparent financial products and services	○		●	●
Social	Financial inclusion	Supporting the growth of micro, small and medium enterprises, expanding access to financial services for underserved and underbanked communities and promoting financial education amongst our customers	○			
Social	Community investments	Providing impact-driven community initiatives and philanthropy	Not identified as material (impact and financial)			
Social	Employee engagement and well-being	Enhancing workplace culture by prioritising employee satisfaction, engagement, health, and well-being	○			
Social	Emiratisation	Empowering Emirati talent through targeted recruitment, development, and retention initiatives	○		●	●
Social	Learning and development	Providing continuous education and upskilling opportunities to employees	○			
Social	Equality, diversity and inclusion	Promoting a diverse and inclusive recruitment and work culture	○			
Governance	Corporate governance, compliance and code of conduct	Adhering to strong governance structures and ethical business practices	○		●	●
Governance	Risk management and cybersecurity	Strengthening risk management frameworks, cybersecurity measures and ensuring the privacy of customer information	○	●		●
Governance	Financial crime, anti-bribery and corruption	Implementing controls and compliance measures to prevent financial crime, bribery, and corruption	○	●		●
Governance	Tax transparency	Ensuring fair and transparent tax practices that comply with local and international regulations and standards	○			

○ Impact materiality ● Financial materiality ● Double materiality

Material topics for ADCB

1. Aligning portfolios and reducing financed emissions
2. Sustainable finance
3. Environmental and Social Risk Management (ESRM)
4. Customer satisfaction
5. Emiratisation
6. Corporate governance, compliance and code of conduct
7. Risk management and cybersecurity
8. Financial crime, anti-bribery and corruption

The topics identified as material through the double materiality exercise are aligned to ADCB's existing sustainability strategy and the Bank will continue to enhance its strategic focus on the identified topics to inform its strategy and disclosures in the future.

ADCB will also evaluate how the outcomes of the materiality assessment can be integrated into its ESG risk management processes.

Double materiality topics: description of material sustainability Impacts, Risks and Opportunities (IROs)

	Positive impact	Negative impact	Risk	Opportunity
1 Aligning portfolios and reducing financed emissions Value chain impact: ⚪ ⚫ Time horizons: 🟠 🔴	**Financing and supporting the net zero transition of our customers (Actual)**	**GHG emissions from our financing and investment activities (Actual)**	**Climate-related transition risk**	**Revenue generation through products and services to support the transition of our customers**
	Redirecting capital towards low-carbon sectors accelerates the global transition to a sustainable economy	Continued financing of high-carbon industries without transition plans exacerbates climate risks, increasing physical and transition risks across economies	Exposure to reputational and litigation risks in case of failure to meet public net zero commitments. ADCB is also exposed to sectors and counterparties with potential climate-related transition risks that could pose credit or liquidity risks for the Bank	Financing and investing to support our customers in their transition towards net zero would strengthen ADCB's market leadership, reduce financed emissions, and improve credit portfolio resilience attracting green capital inflows from investors
2 Sustainable Finance Value chain impact: ⚪ ⚫ Time horizons: 🟡 🟠 🔴	**Financing and supporting sustainable outcomes of our customers (Actual)**	**Stakeholder and society advocacy (Actual)**	**No material risk identified**	Revenue generation through products and services to support sustainable outcomes
	Mobilising capital towards green and social projects drives sustainable economic growth and business practices across industries	Inadequate ESG screening of eligible activities and inaccurate impact measurement could lead to accusations of greenwashing and loss of trust among the society and market stakeholders in sustainable finance agenda	N/A	Expanding sustainable finance offerings across different client segments can enhance market positioning, drive revenue growth, and attract ESG-focused investors
3 Environmental and social risk management Value chain impact: ⚪ ⚫ Time horizons: 🟠 🔴	**Preserving ecosystems and societies (Actual)**	**Damage to society and the environment (Potential)**	**Credit risk increase**	**No material opportunity identified**
	Effective ESRM policies drive responsible investments, protect natural ecosystems, and prevent financing of socially harmful activities	Failing to integrate ESRM into financial decisions can result in funding projects that deepen environmental degradation and societal harm	Weak ESRM policies can increase loan defaults by not fully accounting the climate risk of physical assets. Any physical damage can result in increased impairments on loans increasing their credit risk	N/A
4 Customer Satisfaction Value chain impact: ⚫ Time horizons: 🟡 🟠 🔴	**Positive economic contribution (Actual)**	**Reduced stakeholder trust (Potential)**	**No material risk identified**	**Market growth**
	Providing fair advice and engaging in responsible marketing and sales practices facilitate trust in the financial system and greater confidence in long-term financial planning among the society	Poor customer service and deceptive banking practices can lead to financial exclusion, dissatisfaction, and reduced consumer confidence in the financial system	N/A	Increased customer trust leads to expanded market share and revenue growth

Value chain definitions:

- ⚪ Upstream: Access to capital through our shareholders and investors, procurement of goods and services from our suppliers
- ⚫ Own operations: Effective operations of our offices and branches to ensure continuity of our business
- ⚫ Downstream: Provision of products and services to customers

Time horizons considered:

- 🟡 Less than or equal to one year (<1 year)
- 🟠 One to three years (1-3 years)
- 🔴 Up to 10 years

Double materiality topics: Sustainability Impacts, Risks and Opportunities (IROs) (continued)

	Positive impact	Negative impact	Risk	Opportunity
5 Emiratisation Value chain impact:  Time horizons: 	**Economic and Social contribution (Actual)**	**Reduced economic development (Potential)**	**No material risk identified**	**Increased economic contribution**
	Emiratisation can support local economic growth and strengthens the banking sector's contribution to national workforce development	Inadequate Emiratisation initiatives can reduce local economic participation	N/A	Investing in Emiratisation allows the Bank to attract more Emirati nationals into the workforce and increases ADCB's In-Country Value (ICV)
6 Corporate governance, compliance, and code of conduct Value chain impact:  Time horizons: 	**Strengthened stakeholder confidence (Actual)**	**Reduced trust of ADCB and peer institutions (Potential)**	**No material risk identified**	**Increased investor trust**
	Accountable, transparent, and legally compliant corporate governance upholds financial integrity, ensures fair business practices, and improves market stability and economic resilience	Poor corporate governance can lead to financial scandals, market manipulation, destabilising livelihoods and reducing confidence in financial institutions	N/A	Strengthening corporate governance can improve decision-making, risk management, and regulatory compliance, leading to enhanced financial performance, building trust with investors, and stakeholders
7 Risk Management and Cybersecurity Value chain impact:  Time horizons: 	**Enhances consumer trust (Actual)**	**Data breaches and financial loss (Potential)**	**Data loss, regulatory penalties and reduced stakeholder confidence**	**No material opportunity identified**
	Enhances digital trust and security, protecting customer data and ensuring the integrity of financial transactions, which contributes to economic stability and confidence in the financial system	Weak cybersecurity measures increase the risk of fraud, identity theft, and financial crime, eroding public trust in digital banking and destabilising financial systems	Non-compliance with data privacy regulations can result in significant fines, civil claims and reputational damage	N/A
8 Financial crime, anti-bribery, and corruption Value chain impact:  Time horizons: 	**Contributing to the prevention of financial crime in the UAE (Actual)**	**Reduced trust on financial institutions (Potential)**	**Regulatory fines and reputational damage**	**No material opportunity identified**
	Effective financial crime prevention safeguards economic integrity, strengthens anti-corruption efforts, and promotes ethical business practices against money laundering, terrorist financing, proliferation financing	Failure to prevent financial crime enables corruption, illicit financial flows, and tax evasion, undermining trust in the financial system and harming economic stability	An ineffective financial crime prevention framework exposes ADCB to heightened risks of money laundering, terrorist financing, bribery and corruption, which could result in litigation costs, regulatory fines and may erode investor confidence in the Bank	N/A

Value chain definitions:

- Upstream: Access to capital through our shareholders and investors, procurement of goods and services from our suppliers
- Own operations: Effective operations of our offices and branches to ensure continuity of our business
- Downstream: Provision of products and services to customers

Time horizons considered:

- Less than or equal to one year (<1 year)
- One to three years (1-3 years)
- Up to 10 years

02

Strategic priorities

26 Climate
55 Customers and communities
69 Employees
79 Governance



Climate

29 Aligning portfolios & reducing financed emissions
33 Sustainable finance
41 Environmental & social risk management
51 Operations and supply chain

ADCB’s climate framework

ADCB’s climate strategy is anchored to the UAE’s Net Zero by 2050 strategy and the Paris Agreement. The strategy was approved by the Group Sustainability Committee and subsequently endorsed by the Board Executive Committee. The Bank’s climate framework is aligned with the regulatory requirements of the Central Bank of the UAE (CBUAE) and is designed to drive emission reductions across its financing, operations and supply chain.

In 2025, the Bank adopted its first set of sectoral financed emissions targets for the oil and gas extraction, and power generation sectors, which are the most material contributors to its financed emissions profile. In addition, ADCB surpassed the interim 2025 sustainable finance target of AED 50 billion by raising and facilitating AED 71.9 billion.

ADCB’s climate framework

1	2	3	4
Aligning portfolios and reducing financed emissions	Environmental and Social Risk Management (ESRM)	Sustainable finance	Operations and supply chain
Commitment: Measure our clients’ financed emissions and align sector portfolios in line with the Paris Agreement and the UAE’s Net Zero by 2050 strategy	**Commitment:** Integrate climate within the risk management framework to assess material risks and opportunities within our portfolio	**Commitment:** Provide customers with green products and services to help them reduce emissions	**Commitment:** Reduce emissions in our operations and supply chain

Please click here for **other climate policies**

Further information on **IFRS S2 climate-related disclosures** can be found on pages 141-150

ADCB’s commitments on climate action

UNITED ARAB EMIRATES MINISTRY OF CLIMATE CHANGE & ENVIRONMENT

UAE Ministry of Climate Change & Environment: Climate-Responsible Companies Pledge

Signatory to the ‘Climate-Responsible Companies Pledge’ and committed to measure GHG emissions, develop and disclose plans to reduce emissions

UN environment programme | finance initiative

UN Environment Programme Finance Initiative (UNEPFI) Guidance for climate target settings for banks

Adopted the UNEPFI Guidance for climate target setting for oil & gas and power sectors

اتحاد مصارف الإمارات UAE BANKS FEDERATION

UAE Banks Federation: UAE national banks’ commitment of AED 1 trillion to sustainable finance by 2030

Committed to AED 125 billion to sustainable finance by 2030

ADCB greenhouse gas (GHG) emissions profile

The Bank's GHG reporting is based on the Greenhouse Gas Protocol[1], with 99% of emissions from our financing and investment activities

ADCB's total scope 1, 2 and 3 'operational' GHG emissions (excludes financed emissions)[2]:

25,528 tCO_2e

ADCB's total Scope 3 'financed' GHG emissions[3]:

15.81 million tCO_2e

Scope 1:
1,024 tCO_2e

Direct emissions from the Bank's own operations, i.e. fuel

Scope 2:
17,692 tCO_2e

Indirect emissions from the Bank's own operations, i.e. electricity

Scope 3: Operational
6,812 tCO_2e

Indirect emissions from the Bank's value chain (excluding financed emissions)

99%

of the Bank's emissions are through our clients' financed emissions (Scope 3)

Oil & gas, commercial real estate and power together account for 85% of the Bank's financed emissions

- Oil & gas
- Commercial real estate
- Power generation
- Residential real estate
- Aviation
- Iron & steel
- Road transport
- Shipping

Bank-owned cars

Generators

Offices and branches (electricity bills)

ADCB properties leased to third parties

External data centres

Business road travel

Business air travel

(1) The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard
(2) Reported for 1 January to 31 December 2025
(3) Reported for 1 January to 31 December 2024

Aligning portfolios and reducing financed emissions

Why it matters

As the UAE advances its transition to a net zero economy, climate change presents both systemic risks and opportunities for the financial sector. For ADCB, aligning lending and investment portfolios with low-carbon pathways is critical to managing transition and physical risks while positioning the Bank for sustainable growth. The net zero transition also creates significant opportunities to support clients in their decarbonisation journey and to develop green finance solutions that enhance economic resilience and drive long-term value creation. Financed emissions, those associated with client activities financed by the Bank (Scope 3), account for 99% of ADCB's Greenhouse Gas (GHG) footprint and therefore represent a material component of the Bank's climate strategy.

ADCB climate targets[1]

Power sector reduction in financed emissions by 2030

10%

Oil and gas sector reduction in financed emissions by 2030

9%

ADCB's approach and progress

In 2025, the Bank adopted its first set of sectoral financed emissions targets for the oil and gas extraction and power generation sectors, which are the most material contributors to its emissions profile. These financed emissions targets have been developed using realistic, region-specific decarbonisation pathways while taking into consideration client commitments. This approach is consistent with ADCB's corporate strategy and financial targets, and is aligned with the UAE's climate objectives (NDC 3.0).

Governance of climate targets

In 2025, ADCB's climate targets were approved by the Board Executive Committee (BEC) and Group Sustainability Committee (GSC). These targets are integrated into the Board-approved Risk Appetite Statement (RAS), ensuring that portfolio alignment with the UAE's net zero pathway is monitored alongside the Bank's other principal risks within its risk management framework. Progress against the climate targets is tracked by the Climate Steering Committee (Climate SteerCo), reporting to the GSC. The Climate SteerCo brings together teams from Corporate & Investment Banking Group, Treasury & Investments Group, Credit, Risk, Legal and Sustainability functions.

Performance and assurance

ADCB's financed emissions are calculated in accordance with the Partnership for Carbon Accounting Financials (PCAF) methodology[2], an industry-wide initiative for measuring financed emissions of financial institutions. The Bank's reporting covers outstanding exposures, reflecting loans and advances held for financing and bonds invested in as at 31 December 2024. For further details on our methodology, please refer to page 31.

2024 financed emissions

To ensure the accuracy and completeness of ADCB's financed emissions calculations, the Bank follows market practice and reports with a year lag to incorporate greenhouse gas (GHG) disclosures from our customers into our calculations. ADCB's 2024 financed emissions disclosures have been verified by an external assurance provider. For further details please refer to the independent limited assurance report.

Absolute financed emissions in 2024

Sector	Exposure (AED bn)	Financed emissions, (million tCO_2e)	Δ YoY %[3]	PCAF score[4]
Oil & gas	12.4	10.65	+27% ↑	2.8
CRE[5]	53.6	1.20	-37% ↓	4.3
Power	8.1	1.54	+15% ↑	3.0
Aviation	5.2	0.98	-8% ↓	4.7
Iron & steel	0.8	0.56	+12% ↑	2.0
Road transport	1.0	0.35	+67% ↑	3.9
Shipping	2.3	0.50	+285% ↑	2.9
RRE[5]	17.5	0.03	+50% ↑	4.0
Total	**101.0**	**15.81**	**+16% ↑**	**3.9**

→ 85% of 2024 financed emissions from oil & gas, CRE and power sectors

● Scope 1 ● Scope 2 ● Scope 3

Note: Figures may not add up due to rounding differences

ADCB's absolute financed emissions went up from the recalculated figure of 13.6 million tCO_2e[6] in 2023 to 15.8 million tCO_2e in 2024. This increase of 16% was primarily driven by changes in the portfolio size and mix (contributing 59%) the majority of which was attributed to clients in the oil and gas sector. Additional drivers for the increase were attributed to changes in data quality (contributing 29%) and higher client-reported emissions (contributing 12%). These factors outweighed reductions from client exits or lower reported emissions, resulting in the overall increase in 2024 financed emissions.

(1) Targets against ADCB's 2023 financed emissions baseline for the oil and gas extraction and power generation sectors
(2) The Global GHG Accounting and Reporting Standard for the Financial Industry
(3) Disclosures of 2023 financed emissions can be found on page 111. The year-on-year (YoY) percentage change is calculated based on absolute financed emissions (in million tCO_2e)
(4) PCAF scores based on Scope 1+2 emissions
(5) In line with market practice, ADCB measures financed emissions for buildings that are operational in its commercial real estate and residential real estate measurement, therefore excluding buildings that are under construction
(6) Further details on the recalculation of ADCB's 2023 financed emissions can be found on page 30

Recalculation of 2023 financed emissions and rebaselining of oil & gas sector target

As part of the annual recalculation of its financed emissions baseline, ADCB has updated its 2023 Scope 3 (Category 15) financed emissions. The key changes to the 2023 baseline are summarised below.

Metric[1]	Previously reported (2024 ESG Report)	Recalculated (2025 ESG Report)	Change
Total absolute financed emissions	13.25 million tCO_2e	13.58 million tCO_2e	+3%
Absolute financed emissions - Oil & gas (extraction)	8.08 million tCO_2e	8.4 million tCO_2e	+4%
O&G emissions intensity (tCO_2e/1,000 AED of exposure outstanding)	0.78	0.81	+4%

The recalculation is driven primarily by updated client-level emissions data, including the incorporation of newly available reported emissions from key counterparties which enhanced the accuracy of the Bank's financed emissions estimates for the oil and gas (extraction) sector.

These improvements are consistent with ADCB's hierarchical data prioritisation approach under the PCAF Standard, which favours client-reported emissions over sector-level proxies. The recalculation is attributable solely to technical factors that improve the robustness and accuracy of reporting and does not reflect changes in the Bank's portfolio composition or in clients' underlying emissions performance in 2023.

As a direct consequence of the recalculation described above, ADCB has recalibrated the 2023 base year value for its oil and gas (extraction) sector decarbonisation target. The target ambition expressed as a percentage reduction in emissions intensity from the recalculated 2023 baseline remains unchanged at 9%. The target continues to reflect realistic decarbonisation pathways consistent with client commitments and the UAE's climate objectives as per NDC 3.0.

The rebaselining is driven by the same factors that underpin the recalculation of 2023 financed emissions. The Bank's target-setting methodology, which anchors the O&G target to client-level decarbonisation commitments covering Scope 1 and 2 emissions from extraction activities, remains unchanged.

Updated decarbonisation target for oil & gas sector

Intensity (tCO_2e/TJ)	Previously reported	Recalculated/ Rebaselined
2023 baseline	3.3	5.8
2030 target	3.0 (-9% ▼)	5.3 (-9% ▼)



(1) As at 31 December 2023
(2) Against the 2023 baseline

Progress against climate targets

ADCB tracks progress of its climate targets in the oil and gas and power sectors against defined intensity metrics, supporting the Bank's transition objectives.

Sector	Scenario (based on)	Metric	2023 baseline	2024 progress[2]	2030 target[2]	Scope of emissions	Value chain in scope
Power	UAE NDC 3.0 target	$kgCO_2e$/MWh	299	279 (-7%▼)	270 (-10%▼)	Scope 1 & 2	Generation
Oil & gas	Client commitments	tCO_2e/TJ	5.8	5.1 (-12%▼)	5.3 (-9%▼)	Scope 1 & 2	Extraction

Power sector

In the power (generation) sector, ADCB measures portfolio carbon intensity across scope 1 and 2 emissions, expressed in $kgCO_2e$/MWh. Against a 2023 baseline of 299 $kgCO_2e$/MWh, the 2024 figure stands at 279 $kgCO_2e$/MWh, a 7% reduction.

This reflects ADCB's ongoing financing in support of the UAE's transition to clean energy generation, thereby reducing the sector's portfolio emissions intensity.

Oil and gas sector

In the oil and gas (extraction) sector, ADCB measures portfolio carbon intensity across Scope 1 and 2 emissions, expressed in tCO_2e/TJ. In 2024, the carbon intensity decreased from 5.8 (rebaselined) to 5.1 tCO_2e/TJ, a 12% decrease.This decrease in intensity is primarily driven by changes in portfolio composition.

While current performance is ahead of the updated 2030 target, ADCB will continue to monitor progress annually and reassess the need for recalibration as data maturity improves and clients progress along their climate transition pathways.

Client engagement & transition assessment

Recognising that effective portfolio alignment requires collaboration, ADCB proactively engages with clients in key sectors to support their transition plans. Through this engagement the Bank seeks to understand the clients' transition strategies to identify opportunities for providing tailored products and services that facilitate their transition. ADCB's transition assessment framework adopts a structured two-tier approach to evaluate progress among clients in sectors aligned with the Bank's climate targets.

- **First tier:** high-level overview of each client's readiness assessing their climate transition plans and reporting practices in alignment with regulatory principles. This review identifies the maturity of clients' sustainability strategies and guides the Bank in prioritising engagement
- **Second tier:** involves a more detailed assessment for selected high-priority clients, focusing on climate reporting, governance, strategy, and risk management. This enhances understanding of clients' preparedness and facilitates targeted engagement on transition planning

Client transition assessment and engagement are core to ADCB's transition plan, reflecting its commitment under the UAE Climate-Responsible Companies Pledge and supporting the UAE's Net Zero by 2050 ambition.

ADCB's reporting methodology: Partnership for Carbon Accounting Financials (PCAF)[1]

Financed emissions estimation

Financed emissions are estimated by calculating client-level emissions and attributing them to ADCB, based on the Bank's share of lending as a proportion of the client's valuation.

These client-level emissions are estimated using a range of approaches, depending on data availability, with the PCAF data quality score hierarchy as highlighted on this page.

For real estate, ADCB's methodology relied on estimating property-level emissions and attributing them to the Bank's outstanding share of lending, related to the property value. The real estate emission conversion factors are based on either property floorspace or building type for the UAE.

PCAF calculation

The PCAF methodology attributes a proportion of client emissions produced to the bank responsible for financing them, taking into consideration data availability.

Formula for financed emissions

$$\frac{A\ \text{Investment/ loan amount}}{B\ \text{Company value}} \times C\ \text{Client emissions}$$

Attribution factor

Required inputs to calculate financed emissions

A	**Numerator:** Outstanding amount	Amount of loan or investment in AED
B	**Denominator:** Company value	Enterprise value incl. cash (listed equities) - proxies incl. equity + debt (unlisted companies) or total assets
C	**Client emissions**	Scope 1, 2 and 3 emissions of client (if available)

PCAF data quality score hierarchy

Data preference	PCAF data quality scores	ADCB's approach
Most	1 Reported, verified emissions	Company-level reported emissions (verified) were directly used. Clients' sustainability reports served as the primary source of emissions data. A conservative assumption is applied that only reported emissions with reasonable assurance are classified as verified emissions.
	2 Reported, unverified emissions	Unverified company-level emissions reported in clients' sustainability disclosures were directly used
	3 Estimated using counterparty production	Physical intensity-based emissions were calculated by multiplying client-level production volumes by physical intensities at the sector and production technology level
	4 Estimated using counterparty revenue	Revenue intensity-based emissions were calculated by multiplying client-level revenue data by sector-region revenue intensities
Least	5 Estimated using counterparty exposure	Financed emissions were estimated by multiplying client-level exposure data by sector-region investment intensities

Challenges and limitations

The key challenges with the measurement of financed emissions were as follows:

- Lack of published client emissions, financial and production data, requiring the Bank to fall back on proxies to estimate client emissions
- Differences in calculation methodology and reporting by clients, particularly in scope 3 emissions

The Bank uses appropriate assumptions and estimates, including proxies based on company production and revenue, to address these challenges. ADCB will continue to enhance its estimates of financed emissions through improvements in the granularity and coverage of client data.

Approach to recalculations and rebaselining

ADCB adopts a fixed base-year approach for its financed emissions baseline and sectoral climate targets, consistent with the GHG Protocol and PCAF Standard. The Bank's financed emissions may change upon recalculation due to technical factors, including changes in data quality and availability, changes in emissions proxies, and changes in calculation methodology.

ADCB is committed to updating and disclosing its financed emissions baseline annually, explaining the key drivers of any change versus the prior year. Where a recalculation results in a material change to a previously reported baseline, the Bank will update the affected figures and, where applicable, recalibrate any sectoral decarbonisation targets derived from that baseline to preserve the comparability of progress.

All baseline recalculations and target adjustments are subject to governance oversight through the Climate SteerCo and the GSC, and are integrated into the RAS.

(1) The Global GHG Accounting and Reporting Standard for the Financial Industry

Reporting boundary

The boundary for ADCB's 2024 financed emissions reporting is determined based on four guiding principles: materiality to the Bank, availability of industry guidance, data availability, and peer practices. Over time, ADCB may expand this boundary if the exposure of currently excluded asset class, sector or geography changes materially, or as data availability improves.

ADCB's 2024 financed emissions measurement covers all in-scope products under PCAF guidance, and high-emitting sectors most material to the Bank in terms of exposure. The reporting boundary with exclusions is detailed below. The eight sectors included in the reporting cover ~98% of ADCB's high-emitting sector perimeter as per United Nations Environment Programme Finance Initiative (UNEPFI) guidance by exposure and ~20% of gross loans and investments.

Exposure boundary

ADCB's reporting covers outstanding exposure by considering only loans and advances held for financing and bonds invested in as of 31 December 2024. Undrawn commitments and off balance sheet commitments were not considered, as per industry practice.

High-emitting sector exposure included within ADCB's baseline (equating to 20% of gross loans and investments)

98%

Reporting coverage

Criteria	PCAF asset class	Parent and subsidiaries	High-emitting sector and value chain				
Coverage[1][2]	Project finance	United Arab Emirates	Oil & gas	Upstream (e.g. extraction)	Midstream (e.g. transport)	Downstream (e.g. refineries)	Integrated/diversified
	Business loans	Egypt	Power generation	Manufacturers (OEMs)	Upstream (e.g. generation)	Midstream (e.g. T&D)	Downstream (e.g. retail)
	Commercial real estate	Kazakhstan	Commercial real estate	Upstream (e.g. construction)	Midstream (e.g. energy use)	Downstream (e.g. end of life)	
	Mortgages		Residential real estate	Upstream (e.g. construction)	Midstream (e.g. energy use)	Downstream (e.g. end of life)	
	Corporate bonds		Aviation	Parts manufacturers	Airline manufacturers	Airlines	Aircraft leasers	Full value chain
	Listed equity		Iron & steel	Manufacturers (OEMs)	Upstream (e.g. production)	Midstream: steel to pipes	Downstream: construction	Full value chain
	Unlisted equity		Road transport	Supplier	Auto manufacturers	Service providers	
	Sovereign bonds		Shipping	Upstream/ships manufacturers	Ships leasers	Shipping companies	Shipping servicers	Full value chain
	Motor loans		Cement	Upstream (e.g., raw materials, extraction)	Midstream: clinker and cement manufacturing	Downstream: construction	
			Aluminium	Upstream (e.g., mining)	Midstream: melting	Downstream: fabrication	Downstream: products use	Full value chain
			Agriculture	Dependent on portfolio composition			
			Coal	ADCB has zero direct exposure to coal mining			

In scope Out of scope

(1) Excluded due to immaterial exposure as at 31 December 2024 (against motor vehicle loans, Egypt, Kazakhstan, Aluminium, Agriculture and Cement)
(2) As of 31 December 2024, ADCB has no exposure to coal

Sustainable finance

Why it matters

Embedding ESG considerations in the Bank's investments, lending, products and services enhances long-term value creation while promoting sustainable development. ADCB's focus on sustainable finance strengthens business resilience and risk management, while generating new business opportunities across diverse client segments and attracting ESG-focused investors.

ADCB's approach and progress

At the heart of ADCB's approach to climate is the financing support it provides to customers for initiatives that promote sustainability, including the provision of a suite of green products and services. This approach reflects the belief that investment in the UAE's transition to net zero represents a significant economic opportunity, and that major financial institutions have a critical role in financing and supporting a successful transition.

Furthermore, the Bank recognises the importance of collaborating with external partners to accelerate the shift towards more sustainable financial markets. ADCB is one of the founding signatories of the Abu Dhabi Sustainable Finance Declaration. The Bank continues to proactively engage other external partners through the Global Climate Finance Centre (GCFC) and the UAE Banks Federation (UBF) Sustainable Finance Committee.

Sustainable finance target

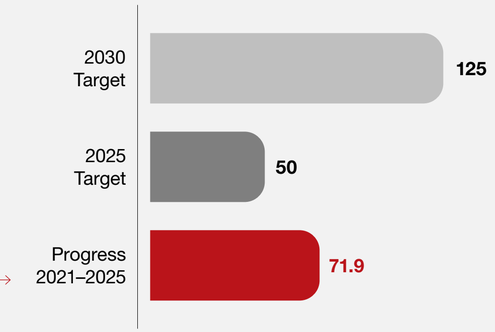
ADCB aims to mobilise AED 125 billion in sustainable finance by 2030, supporting clients in the transition to a low-carbon and inclusive economy. This target reflects the Bank's alignment with the UAE's sector-wide ambition, coordinated through the UAE Banks Federation (UBF), to channel more than AED 1 trillion into sustainable projects by 2030.

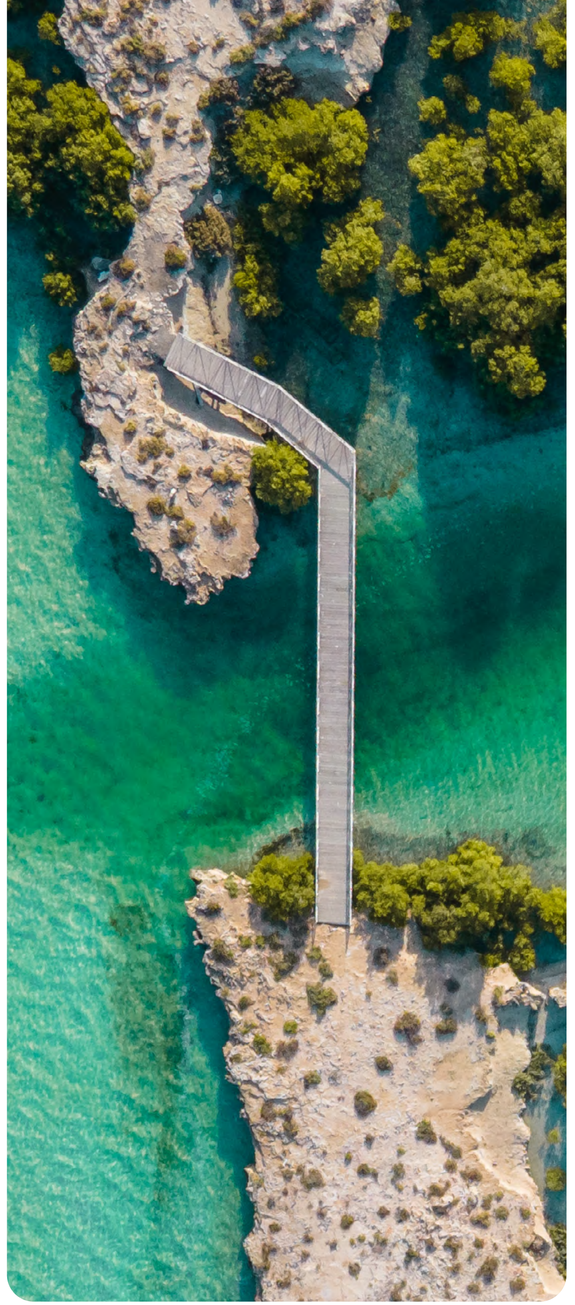
> ADCB has made strong progress on its sustainable finance commitment, surpassing the interim 2025 sustainable finance target of AED 50 billion, a year ahead of schedule. Since 2021, the Bank has raised and facilitated AED 71.9 billion (USD 19.6 billion) in sustainable finance through lending, investments and facilitation of sustainable projects.

Overview of ADCB's sustainable finance portfolio (AED bn)

By category	2021–2024[1]	2021–2025[2]	Δ YoY %
Lending[3]	40.3	50.4	25%
Investing[4]	10.8	12.1	12%
Facilitating[5]	7.5	9.4	25%
Total sustainable financing	**58.6**	**71.9**	**23%**

ADCB's progress towards our sustainable finance commitments (AED bn)





(1) As at 31 December 2024
(2) As at 31 December 2025
(3) For Corporate and Investment Banking Group (CIBG) and Wealth Management Group – Limit booked at execution of new facilities provided (and any incremental increase in limits in case of refinancing). For Retail Banking Group (RBG) – total disbursal
(4) Total invested
(5) For CIBG: Apportioned value of ADCB's participation in the transaction. For Asset Management: Reported as Assets Under Management (AuM)

A new Sustainable Product Framework

ADCB's Sustainable Product Framework (SPF or 'Framework') defines our approach and methodology for categorising, tracking and reporting on sustainable financial products and services. This covers qualifying activities across lending, investment and facilitation. The framework, aligned with international industry guidelines and principles, defines the scope, assessment parameters and standards, as well as the environmental and social (E&S) due diligence requirements and governance approach ensuring the robustness of the Bank's sustainable financing activities.

Activities within the scope of the Framework include:

- **Lending:** Green, social, sustainability (green and/or social) and sustainability-linked financing (including Islamic financing)
- **Investing:** Investments by ADCB Group in green, social, sustainability, sustainability-linked and transition instruments (including sukuk)
- **Facilitating:** ADCB's role in facilitating green, social, sustainability, sustainability-linked and transition investments/financing through our advice, products and financing support that we offer our clients or customers

ADCB has also developed a Green Bond Framework to facilitate the issuance of green bonds for financing and/or refinancing eligible green loans.



ADCB Group Sustainable Product Framework



ADCB Group Green Bond Framework

2025 key updates to ADCB's Framework

In 2025, ADCB carried out a comprehensive review and update of its framework.

The updated framework now incorporates:

- The latest Loan Market Association (LMA) and International Capital Market Association (ICMA) principles, UBF guidance, and current market practices
- Integration of Central Bank of the UAE guidance on the Higher Shari'ah Authority Resolution: 'The Guiding Principles Regarding Islamic Sustainable Finance', reinforcing ADCB's commitment to Shari'ah-compliant sustainable products
- Expanded and refined the eligibility criteria to reflect emerging technologies and social priorities, including
  - Addition of new eligible green activities such as, nuclear, sustainable aviation fuel, Internet of Things (IoT) and Artificial Intelligence (AI) solutions for energy efficiency, green enabling projects
- Addition of new eligible social activities such as,
  - Disaster response and recovery efforts, infrastructure supporting food loss reduction and smallholder farmers.
- Introduction of new products, including Government housing programs, express loans, Sustainable Wakala Deposits
- Update of the exclusion list to align with the latest ESRM Policy

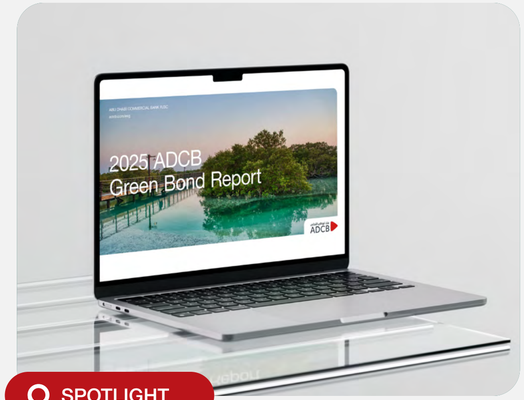
Transparent reporting and assurance

Transparency and assurance underpin ADCB's sustainable finance reporting. We provide clear and consistent disclosures aligned with recognised frameworks and supported by robust internal controls.

ADCB seeks external verification on our sustainable finance reporting on an annual basis, reinforcing the transparency and robustness of the Bank's reporting process.

In addition, we also disclose progress against the target of AED 125 billion to the UAE Banks Federation and to our investors through quarterly communications.

Please click here for the limited **assurance on sustainable finance disclosures**



SPOTLIGHT

Green bond impact and allocation reporting

The 2025 Green Bond Report provides details on ADCB's:

- Eligible Green Loan Portfolio (EGLP)
- Allocation of proceeds to the EGLP
- Estimated environmental impacts

Aligned with the ADCB Green Bond Framework and the International Capital Market Association's (ICMA) Green Bond Principles, the report highlights the Bank's financing of projects in renewable energy, green buildings, energy efficiency, pollution prevention, sustainable water and wastewater management.

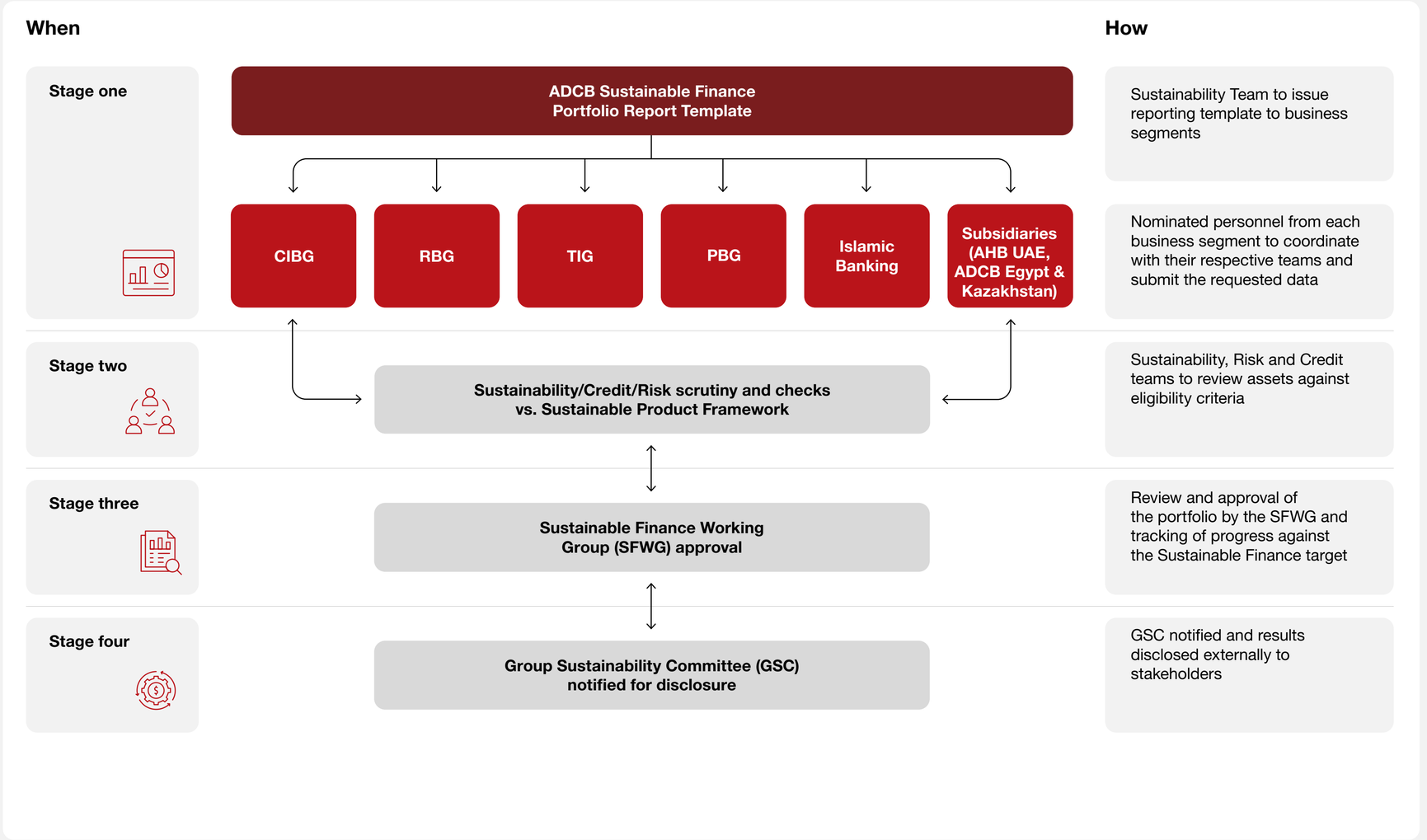
This was ADCB's third Green Bond Report, following the Bank's inaugural USD 500 million green bond issued in September 2022 and the subsequent USD 650 million green bond in September 2023. These issuances reinforce the Bank's ongoing commitment to offering green products and services that support our customers in reducing their environmental footprint.

Governance of sustainable finance

The oversight of sustainable finance activities is led by the Sustainable Finance Working Group (SFWG) comprising senior stakeholders across the Bank, including representatives from Corporate & Investment Banking Group (CIBG), Retail Banking Group (RBG), Treasury & Investments Group (TIG), Private Banking & Wealth Management Group (PBG), Islamic Banking, Risk, Credit, Legal, Compliance and Sustainability teams.

The SFWG reviews the processes, systems and controls related to product classification and documentation to ensure consistent application of the green and social eligibility criteria in accordance with the Sustainable Product Framework. Performance against the sustainable finance target is tracked on a quarterly basis and reported to the Group Sustainability Committee and the UAE Banks Federation (UBF). As a key metric within the Risk Appetite Statement (RAS), this performance is also reported to the Board Risk Committee as part of the Bank's overall risk governance framework.

Process for quarterly monitoring and tracking of sustainable finance portfolio



Lending: green, social, sustainable, sustainability-linked loans

ADCB's lending to green, social, sustainable and sustainability-linked financing (including Islamic financing) has increased to AED 50 billion, a year-on-year increase of 25%.

This includes financing to eligible activities such as: renewable energy, waste management, education, healthcare, and electric vehicles.

Lending[1] (AED mn)	2024[2]	2025[3]	Δ YoY %
Green loans	27,517	31,393	14%
Corporate customers	*21,614*	*24,332*	*13%*
Retail customers	*5,903*	*7,061*	*20%*
Social loans	857	2,432	184%
Sustainable loans	1,286	3,578	178%
Sustainability-linked loans	10,619	12,948	22%
Total sustainable financing (lending)	**40,279**	**50,351**	**25%**

(1) Reported as limit booked/total disbursals
(2) As at 31 December 2024
(3) As at 31 December 2025

Lending case studies

Green loan - Nuclear energy
Barakah One Company PJSC



ADCB participated in the syndicated financing for the Barakah Nuclear Energy Plant, marking the first green loan certified to be aligned with the Loan Market Association (LMA) Green Loan Principles for a nuclear power project in the Middle East and North Africa (MENA) region, and the second globally.

The Barakah Nuclear Energy Plant plays an important part in helping the UAE reach the net zero by 2050 target, generating 40 terawatt-hours (TWh) of electricity per year, which is equivalent to around 25% of the UAE's electricity needs. The plant also prevents the release of up to 22.4 million tonnes of carbon emissions every year.

Limit booked

AED 4.4 bn

Green loan - Energy efficiency
National Central Cooling Company, Tabreed



ADCB participated in a AED 1.2 billion Green Revolving Credit Facility (RCF), with a AED 400 million commitment, to support Tabreed's ongoing investment in sustainable cooling solutions.

The facility is governed by Tabreed's 2025 Green Finance Framework and is fully aligned with the LMA Green Loan Principles, with financing primarily focused on energy-efficient district cooling infrastructure. The transaction supports Tabreed in advancing large-scale decarbonisation through energy efficiency and the integration of renewable energy solutions within its operations.

District cooling centralises chilled water production and distributes it to buildings, in place of traditional air conditioning systems. It is recognised as a key enabler of energy efficiency in the built environment as per the UAE Net Zero by 2050 Strategic Initiative.

Limit booked

AED 400 mn

Social loan - Affordable basic infrastructure
Disaster Reconstruction Fund, Türkiye



In October 2025, ADCB acted as the Initial Mandated Lead Arranger for a EUR 485 million debut syndicated social loan facility for the Disaster Reconstruction Fund (DRF) in Türkiye.

This five year loan is in alignment with ADCB's Sustainable Product Framework and the Social Loan Principles, and supports the Turkish Ministry of Treasury and Finance in mobilising foreign capital for sustainable and inclusive recovery efforts following the devastating February 2023 earthquakes. The proceeds of the facility have been directed toward construction of permanent housing units in 10 provinces severely impacted by the earthquakes.

The transaction marks a significant milestone as the DRF's first mandate awarded to an international commercial bank.

Limit booked

AED 1.5 bn

Lending: Eligible Green Loan Portfolio (EGLP)

The Bank has continued to lend to green projects to support our customers in their transition to net zero. ADCB's EGLP is selected in accordance with the green criteria outlined in the publicly available ADCB Green Bond Framework.

Green assets (AED mn)

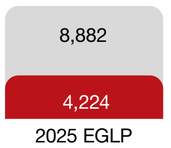
	2024[1]	2025[2]	Δ YoY %
Green assets by eligible category (reported as funded outstanding)			
Green buildings	6,114	7,072	16%
Renewable energy	4,396	5,145	17%
Solar	3,992	4,054	2%
Green Hydrogen	323	432	34%
Wind	81	659	714%
Energy efficiency	940	–	N/A
Sustainable water and wastewater management	546	497	(9%)
Pollution prevention and control	397	392	(1%)
Total Eligible Green Loan Portfolio	12,393	13,106	6%
Total green assets		**13,106**	

Sustainable/green liabilities (AED mn)

	2024[1]	2025[2]	Δ YoY %
Sustainable/green liabilities			
Green bonds issued			
2022 Green bond (ISIN: XS2530757082)	1,837	1,837	0%
2023 Green Bond (ISIN: XS2677030194)	2,387	2,387	0%
Total issuances	4,224	4,224	0%
Sustainable deposits			
Sustainable Call Accounts	24	13	(46%)
Escrow accounts for Green Buildings	324	150	(54%)
Sustainable Wakala Deposits	N/A	162	N/A
Total deposits	348	325	(7%)
Total sustainable/green liabilities		**4,549**	

2.9x total green assets compared to liabilities

Net proceeds of green bonds allocated (AED mn)[2]



Total Eligible Green Loan Portfolio

68% Additional buffer of assets

32% 100% allocation of green bonds issued

Note: Figures may not add up due to rounding differences
(1) As at 31 December 2024
(2) As at 31 December 2025
(3) Energy savings estimated for district cooling services when compared to energy consumption for conventional cooling systems

Green Bond impact report of EGLP (as at 30 June 2025)

Annual financed emissions avoided

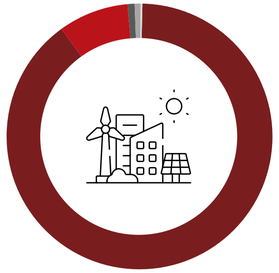
2,357,517 tCO_2e

Annual financed emissions avoided per million invested

178 tCO_2e/AED mn

Avoided emissions by category ('000 tCO_2e per year)

- Renewable energy: 2,118 (89.2%)
- Pollution prevention and control: 198 (8.4%)
- Energy efficiency: 19 (0.8%)
- Green buildings: 18 (0.8%)
- Sustainable water and wastewater treatment: 5 (0.2%)



Other impact metrics by category

Renewable energy

1.7 GW

Energy capacity financed

Pollution prevention and control

170,000 MWh

Electricity generated through waste to energy

Wastewater treatment

139 million m^3

Wastewater treated per year

Green buildings

90 GWh

Energy reduction per year

Energy efficiency

12.5 GWh

Average energy saved through district cooling[3]

Note: The estimated impacts presented are based on our calculations using publicly available data, as reported by relevant projects or companies. In cases where data was unavailable, the Bank relied on assumptions and estimates specific to each asset type and location. The estimated impacts include projects in operation and under construction. The impacts presented are for the EGLP as at 30 June 2025. For further information, please refer to our 2025 Green Bond Report

Facilitation - Debt Capital Markets

To support the transition to a green economy, ADCB facilitated the following ESG deals in the debt capital markets.

Selected Debt Capital Markets (DCM) ESG deals facilitated by ADCB in 2025

Oman Electricity Transmission Company

USD 750,000,000

5-year Green Sukuk

4.66% Notes Due 2030
Senior Unsecured/144A/RegS

Joint Lead Manager & Joint Bookrunner

October 2025

Binghatti Holding

USD 500,000,000

Long 3-year Green Sukuk

7.75% Notes Due 2029
Senior Unsecured/RegS

Joint Lead Manager & Joint Bookrunner

September 2025

Sobha

USD 750,000,000

5-year Green Sukuk

7.13% Notes Due 2030
Senior Unsecured/RegS

Joint Lead Manager & Joint Bookrunner

September 2025

Masdar

USD 1,000,000,000

5 & 10-year dual-tranche Green Bond

4.88% & 5.38% Notes Due 2030 & 2035 Senior Unsecured/RegS

Joint Lead Manager & Joint Bookrunner

May 2025

Omniyat Holding

USD 500,000,000

3-year Green Sukuk

8.38% Notes Due 2028
Senior Unsecured/RegS

Global Coordinator
Joint Lead Manager & Joint Bookrunner

April 2025

Aldar

USD 500,000,000

10-year Green Sukuk

5.25% Notes Due 2035
Senior Unsecured/RegS

Joint Lead Manager & Joint Bookrunner

March 2025

Saudi Electricity

USD 1,250,000,000

10-year Green Sukuk

5.49% Notes Due 2035 Senior Unsecured/RegS

Active Bookrunner

February 2025

Facilitation by category (AED mn)	2024[1]	2025[2]	Δ YoY %
Green bonds	2,191	2,599	19%
Sustainability bonds	2,565	2,637	3%
Green/sustainability sukuks	1,608	2,654	65%
Total sustainable financing (facilitation - DCM)[3]	**6,363**	**7,890**	**24%**

Corporates GREs Financial Institutions

DCM ESG deals facilitated by ADCB[4]

Number of ESG tranches

27

Total volume of transactions

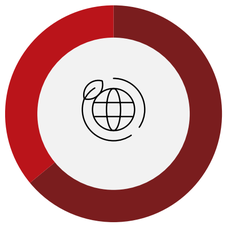
AED 71 bn

Total facilitation[3]

AED 7.9 bn

Breakdown of ESG deals facilitated

- Green 67%
- Sustainable 33%



(1) As at 31 December 2024
(2) As at 31 December 2025
(3) Apportioned value of ADCB's participation in the transaction
(4) Since 2021

Facilitation – Asset Management

Highlighting ADCB Group's commitment to responsible investment, the Responsible Investment Policy, covers ADCB Asset Management Limited (AAML) managed funds, third-party mutual funds, and structured products and single securities.

It also sets out how AAML identifies, prioritises and manages the 'principal adverse impacts' on sustainability factors.

Other key activities implemented by AAML in 2025

- Recorded growth in funds promoting environmental and/or social characteristics, aligned with the EU Sustainable Finance Disclosure Regulation (SFDR) Article 8 requirements
- Continued to strengthen and embed the implementation of strategic ESG initiatives across the Asset Management business

ESG and sustainable investments (through AAML) (AED mn)[1]	2024[2]	2025[3]	Δ YoY %
ESG focused impact investments[4]	11	6	(46%)
ESG focused thematic investments[5]	58	124	114%
ESG assessed investments[6]	1,078	1,411	31%
Total sustainable financing (facilitation - AAML)	**1,147**	**1,541**	**34%**

Responsible Investment Policy

The Responsible Investment Policy commits AAML to integrating Environmental, Social and Governance (ESG) factors into investment processes, offering a variety of ESG solutions across asset classes.

In addition, the policy outlines our commitment to transparent disclosures under the EU 2019/2088 Sustainable Finance Disclosure Regulation, in particular under Articles 3, 6, 8 and 9.



Please click here for Asset Management Limited Responsible Investment Policy published during 2025

Assets Under Management (AuM) comply with SFDR Article 8 & 9 in 2025[1]

17%

Note: ESG funds classified as per the SFDR Directive - Article 8-9
(1) Reported as Assets Under Management (AuM)
(2) As at 31 December 2024
(3) As at 31 December 2025
(4) Only products mapped to Article 9
(5) Only products mapped to Article 8 and with a declared SDG commitment
(6) The remaining products mapped to Article 8 and without a SDG commitment
(7) Figures may not add up due to rounding differences

Investments - Treasury

Treasury investments in green/social/sustainability/ sustainability-linked bonds or sukuk

The governance and reporting arrangements for sustainable investments comprise a clearly defined process for the identification and review of eligible investments, which are integrated into ADCB's Treasury Investment Policy.

Investments through Treasury (reported as total value invested) (AED mn)	2024[2]	2025[3]	Δ YoY %
Green bond/sukuk	6,120	6,081	(1%)
Social bond/sukuk	1,612	2,364	47%
Sustainability bond/sukuk	2,831	3,633	28%
Sustainability-linked bond/sukuk	213	–	N/A
Total sustainable financing (investments)	**10,776**	**12,079[7]**	**12%**

Process for the identification and review of sustainable investments

1. **Identification**
   ESG bonds as listed on Bloomberg
2. **Screening of E&S risks**
   As per the ESRM Policy and RepRisk screening
3. **Confirmation of eligibility based on availability of**
   - Issuance framework as per international standards and principles (e.g. Green, Social, Sustainable Bond Principles)
   - Second-party opinion
   - Allocation and impact report (at least 1 year after bond issuance)

Sustainable finance – overview of sustainable products and services for retail customers

The Bank continued to support customers in their transition to net zero with green/sustainable products and services.

Social welfare lending



Affordable housing financing

- In partnership with Abu Dhabi Housing Authority (ADHA), ADCB offers a Housing Top Up facility for eligible UAE Nationals to finance amounts exceeding the ADHA profit free limit. The facility includes up to 50% profit subsidy by the Abu Dhabi Government on top up amounts of up to AED 500,000

Total booking (AED)

70 mn



Express loans

- The Bank's Express Loan is a short-term credit facility (up to a maximum of AED 10,000) designed to serve pre-qualified customers with monthly incomes below AED 5,000
- This product directly supports our objective to offer accessible and responsible credit to people who may otherwise have limited access to formal financial services

Customers have availed this facility

17,000+

Green lending



Green home & car loans

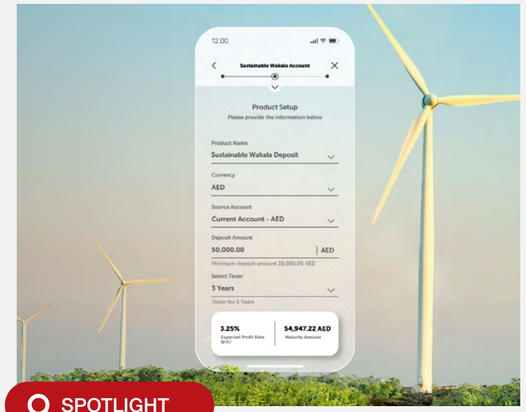
- Supports purchase of eco-friendly homes and eco-friendly vehicles such as electric vehicles (EVs), hybrids and plug-in hybrids
- Includes financing of electric chargers and related accessories

Green car loans (AED)(1)

808 mn

Green home loans (AED)(1)

131 mn



SPOTLIGHT

Sustainable Wakala Deposit: A product for a sustainable future

In 2025, ADCB Islamic Banking introduced the Sustainable Wakala Deposit, a Shari'ah-compliant savings product designed to align financial growth with sustainable development.

The product invests customer deposits in ESG-eligible sukuks, ensuring funds support sustainable economic activities. This initiative reflects ADCB's commitment to integrating sustainability into its Islamic offerings, with robust governance and reporting under the Sustainable Product Framework. Reinforcing the Bank's digital-first strategy, customers can seamlessly open and manage their Sustainable Wakala Deposits through the ADCB mobile banking app.

Since its launch in July 2025, the Sustainable Wakala Deposit has attracted 335 deposits totalling AED 162 million by the end of the year.

(1) Total disbursals since 2021

Environmental and social risk management (ESRM)

Why it matters

The ESRM framework sets out how the Bank identifies, assesses, manages and monitors environmental and social risks (E&S) across all its business activities. By incorporating E&S considerations into the risk management framework and lending practices, the Bank strengthens its due diligence process, making risk management more effective while creating new opportunities.

ADCB's approach and progress

ADCB's ESRM framework is an integral part of its enterprise risk management framework. The Board Risk Committee (BRC) sets strategic direction and approves the Group-wide ESRM policy and the Sustainability Risk Appetite Statement (RAS). The Risk Management Committee (RMC) and the Group Sustainability Committee ensure effective implementation across business and risk teams.

2025 highlights

- Expanded risk appetite metrics to include financed emissions
- Integrated ESG risks into operational, third-party and liquidity risk assessment
- Incorporated high priority clients from the oil & gas and power sectors (linked to ADCB's climate targets) and liquidity and market sensitivity into climate stress-testing
- Moved ESG risk assessment and credit counterparty scorecards from second to first line of defence

ESRM Policy and key objectives

The purpose of ADCB's ESRM Policy is to define the principles for the identification, measurement, monitoring and reporting of E&S risks across ADCB's business units.

The key objectives of the Policy are as follows:

- Incorporate material E&S risks into the overall risk appetite framework of the Group
- Establish an effective E&S risk governance structure and oversight with clear responsibilities across the three lines of defence
- Create a common definition for E&S risks and related terminologies across the Group
- Define the framework to identify, assess, monitor, and report material E&S risks faced by the Group
- Promote training and development for E&S risk management as and when required
- Develop E&S risks awareness and understanding at all levels as well as embed the importance of sustainability in the existing risk culture

> In line with the ESRM Policy, the Bank maintains sector-specific guidance for high-risk sectors. ADCB does not provide financing for coal-related activities, consistent with its broader climate strategy.

The policy is reviewed annually to reflect evolving regulatory requirements, including the CBUAE's Climate-related Financial Risk Regulation, and is informed by industry best practice including the Equator Principles and International Finance Corporation (IFC) Performance Standards.

ADCB Group E&S risk governance framework

Implementation of the ESRM Policy is led by the Group Chief Risk Officer, and is supported by a dedicated ESG Risk function. Coordination is managed through the ESRM Working Group, a subcommittee of the Group Sustainability Committee, ensuring consistent application of standards across all business units, including our subsidiaries.



The ESRM Policy covers a detailed list of responsibilities for the Group Chief Risk Officer, the Management Credit Committee, Group Credit, Group Risk, Group Sustainability, and the business units.

Risk strategy and appetite

The Group assesses various risks and opportunities and their impact in the short, medium, and long term. Such information is utilised for decision-making, business strategy as well as financial planning to navigate current and future risks.

The Group sets sustainability-related risk appetite indicators to support its strategic plans. These indicators are a mix of qualitative and quantitative criteria, including:

- Exposures to 'Restricted' sectors as defined in the Group ESRM policy
- Group's operational Greenhouse Gas (GHG) emissions footprint
- Adherence to the ESRM Policy (including portfolio-level caps on high-risk sectors linked to climate transition and completion of ESG assessments for in-scope counterparties)
- No direct exposure to coal
- Level of the sustainable financing achieved (AED 125 bn by 2030)
- Reductions in financed emissions for the oil & gas and power sectors

The Sustainability risk appetite statement is reviewed and approved by the Board Risk Committee on an annual basis and monitored on a quarterly basis by the BRC. ADCB continues to further embed ESRM into all its risk management processes and policies.

Materiality assessment

ADCB carries out an annual materiality assessment to identify exposure to sectors that have high E&S risks. This assessment is carried out to gather insight on the exposure and materiality of different E&S risks for the Group and to proactively manage the identified risks.

The materiality assessment focuses on risks emanating through the transmission channels, as defined in the Bank's ESRM Policy, and considers the following dimensions:

- Portfolio weight to 'Excluded', 'Restricted' and 'High-risk' sectors
- Exposure by risk rating and residual maturity to 'Excluded', 'Restricted' and 'High-risk' sectors
- Exposure to high physical risk countries

Based on a combination of the above, the E&S risks are rated as Low, Medium or High. Group Risk monitors portfolio exposure to economic sectors with material E&S risks and reports performance to the Risk Management Committee (RMC) and the Group Sustainability Committee (GSC).

Further information on **ESRM exposures** can be found in 'Data and Assurance' section

Portfolio exposure to economic sectors with material E&S risks

Sector	2024 portfolio exposure (%)[1]	2025 portfolio exposure (%)[1]	Transition risk[2]
Oil & gas extraction	3.3%	2.1%	High
Power - conventional	2.5%	0.3%	Medium
Power - renewables	1.1%	1.0%	Low
Real estate investment	13.0%	6.8%	Medium
Aviation	1.3%	1.0%	High
Shipping	0.1%	0.3%	High
Manufacturing	3.3%	3.0%	Medium

Transition risk levels: Low Medium High

Total lending (gross) to oil and gas extraction[3]

2.1%

Direct exposure to coal mining

Zero

(1) Portfolio exposure (%) reported for ADCB UAE as at 31 December of the reported year
(2) Transition Risk heat map is based on the European Bank for Reconstruction and Development (EBRD) classification as well as ADCB's internal assessment
(3) Equates to AED 16.2 billion, UAE loans and advances only

E&S risk identification

Risk management

The key foundation of E&S Risk management is to be able to identify environmental and social risks arising from clients, transactions, sectors, geographies, and the Bank's own operations, and assess how these risks could translate into credit, market, operational, legal, reputational, or strategic risk.

E&S risks cut across the principal risk categories (credit, market, liquidity and operational) and can materialise from both direct and indirect channels:

- **Direct channels** – operations of the Bank's premises, infrastructure, and employees
- **Indirect channels** – the financial services and support the Bank provides to counterparties who may be exposed to E&S risks

E&S risk identification tools

ESRM policy outlines various methodologies to identify and assess E&S risks:

1) screening for excluded/restricted sectors
   - excluded and restricted sectors as outlined in ESRM policy
   - controversy screening for any publicly known negative news linked to E&S risks are tracked using external data provider
2) sector specific heat maps (low/medium/high E&S risk categories)
3) E&S risk assessment and due diligence (through a detailed questionnaire)

Environmental risks

Environmental risks refer to any negative impact to the Group's premises, reputation and credit exposures to counterparties that may potentially contribute to or be affected by climate change and other forms of environmental degradation (such as air pollution, water pollution, scarcity of freshwater, land contamination, biodiversity loss and deforestation).

Climate-related financial risks comprise two main drivers:

- **Physical risk:** refers to the financial impact of a changing climate, including more frequent extreme weather events. Physical risk is categorised as 'acute' when it arises from extreme events, such as droughts, floods, and storms, and 'chronic' when it arises from progressive shifts, such as increasing temperatures and sea level rises. This can directly result in, for example, damage to property or reduced productivity, or indirectly lead to subsequent events, such as the disruption of supply chains
- **Transition risk:** refers to an institution's financial loss that can result, directly or indirectly, from the process of adjustment towards a lower-carbon economy. This could be triggered, for example, by a relatively abrupt adoption of climate policies/taxes, regulatory changes, technological progress or changes in market and customer preferences

Social risks

Social risks refer to any negative impact on the Group's business activities and reputation due to its financing to counterparties that may contribute or be affected by social factors, such as violation of human rights, unfair labour practices, unsafe working conditions and the mishandling of customer privacy.

For example, the risk of financial loss by the exposure to counterparties exposed to potential fines or reputational damage due to fatalities and incidents in the workplace.



SPOTLIGHT

Nature and biodiversity

As part of its customer onboarding and ongoing review processes, ADCB assesses potential nature-related impacts across its portfolio, with a focus on material sectors and clients. Certain industries and sub-industries are identified as excluded or restricted, and the Bank does not provide financing for activities in these areas, in line with the ESRM Policy.

Biodiversity and nature-related considerations, such as water use, waste management, and environmental regulatory compliance are embedded within the Bank's ESG assessment of clients, supporting the identification and monitoring of nature-related risks.

ADCB's approach to climate risk assessments

Risk type	Climate risk type	Time horizon	Potential impact of climate risk	ADCB's current practice
Credit	Transition Risk	Short, Medium, Long	• The failure of borrowers to adapt their business models to a low-carbon economy may lead to heightened credit risk and increase the risk of financial loss • Higher operating costs for carbon-intensive customers, including the introduction of a carbon tax and new data requirements on emissions • Extreme weather leading to higher retail and corporate loan defaults and lower collateral values may lower revenue as well as raise insurance premiums and coverages	• Incorporates a series of Key Risk Indicators (KRIs) and Sustainability-related Risk Appetite Statement (RAS) in place to monitor the exposure of corporate lending portfolio to high transition risk sectors • Conducts materiality assessment to gather insight on exposure and materiality of different E&S risks for the Group and to proactively manage the identified risks • Subjects new to bank/existing customers operating in high-risk sectors to ESG clearance, through the ESG assessment, as part of credit approval process and in line with the ESRM policy • Subjects customers with high/severe ESG rating to ESG enhanced due diligence • Engages key customers in priority sectors through a transition assessment questionnaire to assess the credibility of their transition plans • Carries out climate stress tests for physical risk and transition risk
	Physical Risk	Short, Medium, Long	• Adverse weather conditions can result in property damage, affecting the value of collateral and causing significant financial losses	
Market	Transition Risk	Short	• Transition risks can lead to stranded assets when regulatory shifts and policy changes lower the value of investments. Changes in market perception could lead to wider credit spreads	• Runs specific sensitivity tests based on various climate-related shocks • This analysis includes measuring the Value at Risk (VaR) impact on the total portfolio under these climate condition. Physical risk scenario: i. flood resilience against acute weather events ii. transition risk scenario aligned with those applied in climate credit stress testing iii. Modeling the specific impact on High Quality Liquid Assets (HQLA) bond valuations
	Transition Risk, Physical Risk	Short	• Extreme weather events could raise concerns about the financial stability of companies operating in the impacted sectors. This uncertainty can lead to a repricing of equities, fixed income securities, and commodities	
Liquidity	Physical Risk	Short	• Extreme weather conditions can disrupt business operations and cash flows, potentially disrupting liquidity. This may impair the Bank's ability to meet its short-term obligations, impacting the stability of the Bank deposits and overall financial health	• Similar to the approach for market risk, the impact of climate stress test scenarios is also estimated on liquidity
Operational	Transition Risk, Physical Risk, Liability Risk	Short, Medium, Long	• Potential impacts include disruption to business continuity due to extreme weather (e.g. power outage, flooding, staff absence), and regulatory fines for non-compliance with emerging climate disclosure regulations	• Operational Risk Identification: Climate Risk considerations are embedded in the operational risk taxonomy and assessed via Risk & Control Self-Assessment (RCSA) • Third-Party Risk Management Policy mandates climate risk assessment for vendors. This includes the identification of vulnerabilities, mitigation measures, and emissions targets in order to align third parties with the Bank's sustainability goals • The Business Continuity Management (BCM) Policy has integrated climate-related risks into continuity planning, with location-level assessments considering environmental hazards and physical climate risks to critical sites and data centres
Reputational	Transition Risk	Not applicable	• ESG and Climate Risk is embedded as a specific risk factor within the Bank's reputational risk scorecard and forms a critical determinant of overall reputational exposure. Failures to manage environmental, social, and governance dimensions such as climate transition, community impact, employee welfare, and governance integrity can significantly erode stakeholder trust, damage brand value, and impair long-term business performance	• As reputational risk is consequential in nature, arising from deficiencies in underlying risk types, ADCB integrates ESG metrics and climate-related indicators into its reputational risk scoring methodology to ensure proactive monitoring and escalation. Furthermore, the Bank has established a dedicated ESG-specific procedure to handle all ESG-related matters, including climate-related financial risks, ensuring that such risks are assessed, managed, and escalated in line with regulatory expectations and global best practices

E&S risk assessment and scorecard

E&S risk assessment begins with front line units conducting screening against the ESRM exclusions and restricted lists, followed by determining the E&S risk exposure of potential customers through our scorecard.

The E&S scorecard includes quantitative and qualitative assessments which collectively provide a combined E&S risk rating outcome for customers at a company level.

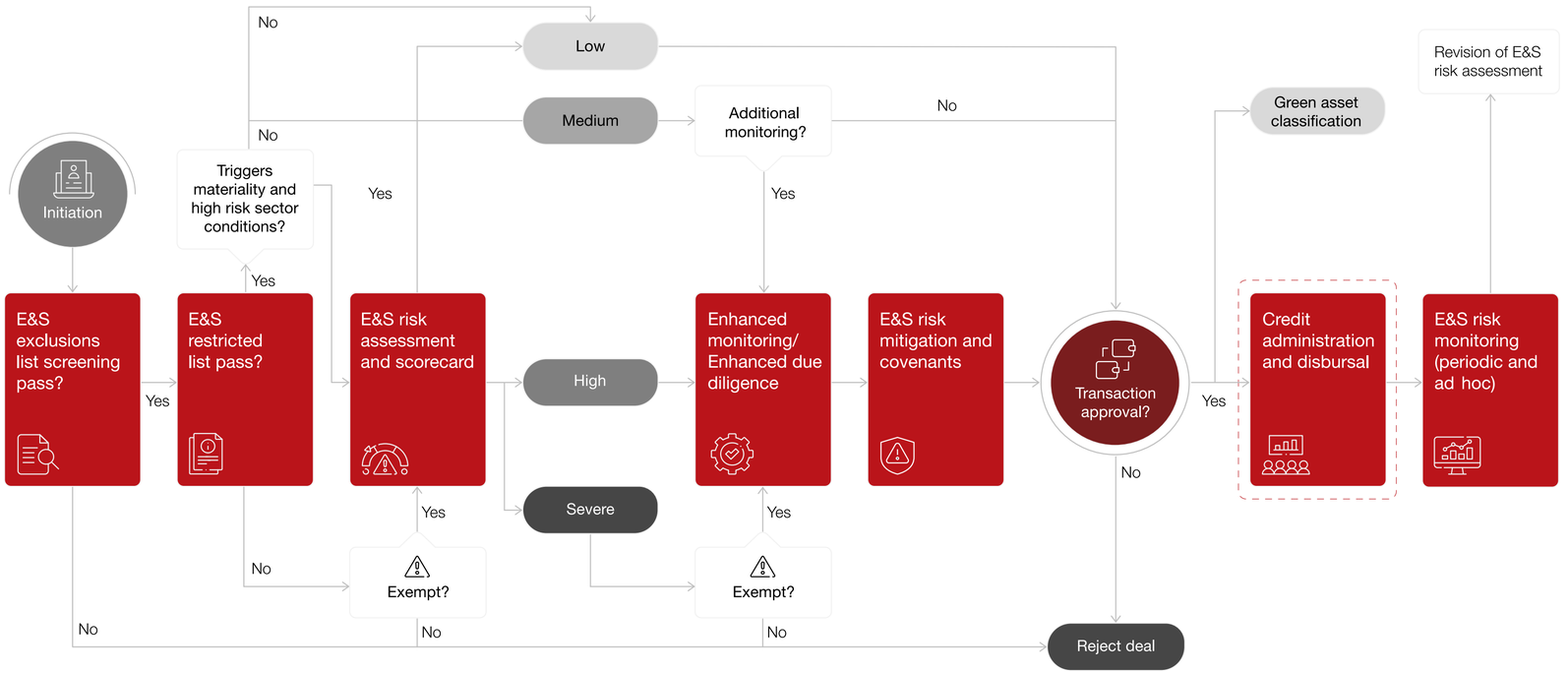
This assessment is completed at the onboarding phase of new customers and as part of a periodic credit review for existing customers. This approach ensures that environmental and social factors are considered alongside conventional credit metrics before financing is approved.

The scorecard has four risk categories:

- **Low:** No further action required. Business units proceed with standard credit approval process steps
- **Medium:** The risk is acceptable. Further due diligence may be proposed to limit the risk of escalation to high or severe levels
- **High:** The Group performs enhanced monitoring and/or enhanced due diligence and establishes mitigation measures
- **Severe:** No engagement and exit from the client relationship, unless approved as part of the exceptions and exemptions mechanism

Overview of E&S assessment in the credit approval process

ADCB continues to strengthen its approach to E&S risk assessment by increasing the scope of the ESRM Policy and the associated scorecard to increase coverage of our lending portfolio and other asset classes.



Reputational risk

ESG and climate risk is embedded as a specific factor within the Bank's Reputational Risk scorecard and forms a critical determinant of overall reputational exposure. Failure to manage environmental, social, and governance dimensions such as climate transition, community impact, employee welfare, and governance integrity can significantly erode stakeholder trust, damage brand value, and impair long-term business performance.

ADCB integrates ESG metrics and climate-related indicators into its reputational risk scoring methodology to ensure proactive monitoring and escalation. Furthermore, the Bank has established a dedicated ESG-specific procedure to handle all ESG-related matters, including climate-related financial risks, ensuring that such risks are assessed, managed, and escalated in line with regulatory expectations and global best practices.

ADCB's approach to managing reputational risk and greenwashing

At Group level there are 10 types of reputational risk, including ESG

- Risk management and control
- Corporate culture
- Business performance
- Systems and cybersecurity
- Financial/fraud/ conduct risk
- Corporate governance
- Customer satisfaction
- Legal and regulatory compliance
- Publicity and media
- ESG (incl. greenwashing)

Sources of ESG reputational risk ('triggers')

- Investments, lending, products and services
- ESG-related reports and disclosures
- Communications, social media & advertising

Process for identifying, assessing, mitigating, reporting and monitoring ESG-related reputational risk:

Step 1	Step 2	Step 3	Step 4	Step 5
Identify: potential reputational risk,via either market - scan or escalation to reprisk@adcb.com	**Assess:** ESRM working group assess & classifies event as Minor/Moderate/Severe and recommends appropriate mitigation measures	**Mitigate:** appropriate mitigation measures recommended by ESRM for approval by the Group Sustainability Committee (GSC)	**Report:** all cases and decisions logged by ESRM WG with moderate and severe cases reported to GSC	**Monitor:** ongoing monitoring undertaken by ESRM WG with any escalations to GSC

Minor
Moderate
Severe

Climate risk stress testing

ADCB conducts climate scenario analysis and stress tests in order to assess the impact of material climate risks on the Bank's lending portfolio. As data quality and accuracy improves, this information will be used to guide the Bank's strategy and risk appetite.

ADCB has conducted stress tests leveraging scenarios from the widely adopted Network for Greening the Financial System (NGFS).

Climate scenarios

Long-term scenarios

NGFS climate scenarios provides a set of seven scenarios covering both physical and transition risks under three broad categories of orderly transition, disorderly transition and a hothouse world. The Macroeconomic variables (MEVs) sourced for each scenario are from the National Institute Global Econometric Model (NiGEM).

ADCB selected the following 3 scenarios to run both the client (bottom-up) and portfolio level (top-down) climate stress tests for long-term assessment:

- **Net Zero 2050** under orderly transition (impact of high transition risk and low physical risk)
- **Delayed transition** under disorderly transition (impact of higher transition and physical risk)
- **Current policies** under hothouse world impact of (higher physical risk and low transition risk)

The time horizons applied for these exercises are:

- Short-term (by 2030)
- Medium-term (2030-2040)
- Long-term (2040-2050)

These exercises support the promotion of climate analytics awareness and capability assessment through data gathering, modelling and measuring climate-related financial risks across the Bank. The observations from these exercises shapes the Bank's future climate analytics framework.

Short-term scenarios

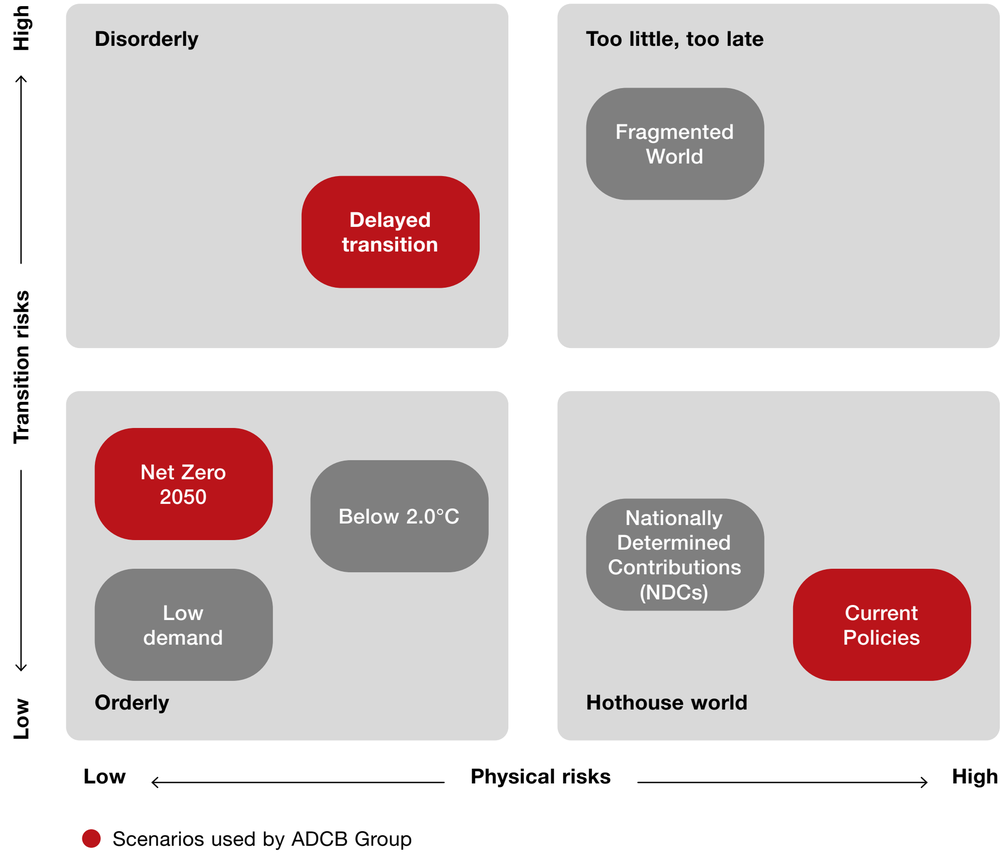
In 2025, ADCB conducted its first short-term risk assessment using NGFS short-term scenarios. These scenarios focus on immediate impacts and support short-term decision-making, complementing the Bank's existing long-term scenarios that help mitigate disruptions over extended timelines.

The NGFS short-term scenarios consists of four scenarios and the scenario used by ADCB in 2025 was **Highway to Paris**. The scenario assumes orderly, globally coordinated green transition with ambitious policies.

> The long-term climate stress test results were submitted to the Central Bank of the UAE as part of its Internal Capital Adequacy Assessment Process (ICAAP) submission.

For further details on the Climate Risk Scenarios, please refer to **the NGFS Scenarios Portal**

NGFS Climate Scenario Framework



Overview of climate stress tests in 2025

Credit risk

Long-term

Client level

The Bank assessed the impacts of the selected NGFS scenarios on customers operating in carbon-intense economic sectors, i.e. oil & gas, power generation, transportation (shipping, aviation and auto), and commercial real estate.

High priority clients identified for the oil & gas and power sectors (linked to ADCB's climate targets) were also considered as part of this exercise.

The analysis involved translating different climate scenarios and sector-specific supply and demand elasticities and market dynamics into financial drivers including price, volume, unit cost, capex, and asset value. These drivers were then used to forecast company financial statements under various climate scenarios to assess the impacts on customers' probability of default (PD), loss given default (LGD) and expected credit loss (ECL) until 2050.

Portfolio level

ADCB also ran a top-down stress test for its corporate lending portfolio, covering all industries and customer types.

The exercise estimated the total impact on the portfolio's ECL, PD and LGD. The Bank's methodology ensures that customers experiencing significant credit deterioration are downgraded to IFRS Stage 2, while the customers with the highest credit risk are moved to Stage 3.

Short-term

Client level

The methodology and scope of this exercise is aligned to long-term bottom-up exercise.

The assessment integrated high-priority clients identified for the oil & gas and power sectors (linked to ADCB's climate targets).

While the short-term scenario assessment was carried out as a preliminary exercise in 2025, the Bank will integrate the lessons learned from this exercise to enhance our approach in the future.

CBUAE physical risk

This regulatory exercise aimed to foster learning and build capacity in modelling and measuring climate-related financial risks for both the CBUAE and participating banks, considering key credit risk parameters, including PD, LGD, and ECL.

ADCB utilised the Shared Socioeconomic Pathways (SSP) climate model for the physical risk assessments, as prescribed by the CBUAE. The prescribed model was the SSP5-8.5 with a 250-year return period flood event projected for the year 2050.

Under the CBUAE prescribed climate stress testing requirements, the majority of exposures were concentrated in zones with low rainfall, storm surge, flood risk, mitigating the overall impact.

Operational risk

Climate risk-related stress testing considers potential climate-driven disruptions (e.g., business continuity events due to extreme weather, regulatory fines for non-compliance with emerging climate disclosure regulations).

Climate-related risks do not currently present material operational risk exposure for ADCB, given the Bank's operational footprint. Potential climate risk drivers, such as physical risk (extreme weather events), transition risk (regulatory changes, carbon pricing), and liability risk, have not resulted in significant historical operational risk losses.

Market & liquidity risk

Shock scenarios:
The Bank runs specific sensitivity tests, such as an 'Isolated oil-price Shock'.

Portfolio impact:
Analysis includes measuring the Value at Risk (VaR) impact on the total portfolio under these climate conditions.

Bank-specific liquidity stress tests:
Physical risk scenario (acute): Flood scenario resilience test.

Transition risk scenario:
'Net Zero by 2050', Modelling the specific impact on High Quality Liquid Assets (HQLA) bond valuations.

Insights from the stress tests completed will inform and shape the Bank's future climate analytics framework

Climate modelling approach

For the purpose of the climate stress testing exercise, the Bank has considered the compounded effects of both transition risk and physical risk on the corporate lending book by evaluating the impacts on the Probability of Default (PD), Loss Given Default (LGD) and Expected Credit Loss (ECL).

Additionally, physical risk impacting LGD is incorporated specifically for exposures secured by real estate collateral, recognising the susceptibility of these assets to climate-related damage. ADCB has used this exercise to identify potential model related enhancements, data requirements and the current maturity levels of customers in terms of climate risk awareness and preparedness.

As part of ADCB's wider ESG Agenda, all exercises support the promotion of climate analytics awareness and capability assessment in data gathering, modelling and measuring climate-related financial risks across the Bank.

Monitoring, audit & continuous improvement

ADCB applies a continuous-improvement approach to climate stress testing, reinforcing its commitment to resilience and best practice. Robust internal audit reviews, complemented by targeted CBUAE thematic assessments help to evaluate the effectiveness of controls and highlight opportunities for enhancement. The Bank benchmarks its methodologies against global standards, engaging external experts where necessary to validate and strengthen its frameworks. Insights from these evaluations are methodically integrated into policy and system updates, ensuring the climate risk management framework remains adaptive to evolving market dynamics.

Summary of results of climate stress tests on ADCB's portfolio (representing compounded effects of both transition and physical risks)

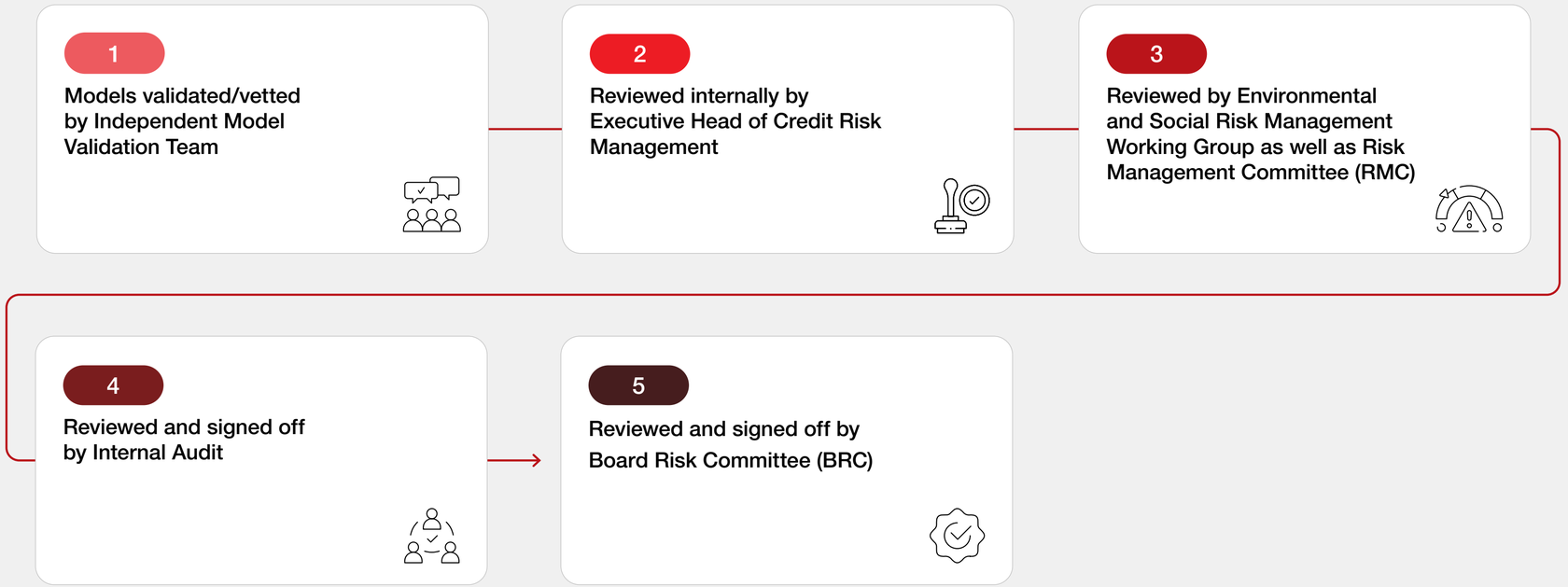


(1) Other sectors cover the rest of the portfolio (including real estate and construction)

Climate stress test governance

The ‘ESG Risk’ and ‘Model Development & Stress Testing’ teams are responsible to execute the climate stress test exercise. ESG Risk management is a dedicated risk vertical and is part of the overall Group Risk Management.

The climate stress test results are subject to the following governance process:



Future enhancements

The completion of the climate stress test is a significant step for the Bank in measuring the potential impacts of climate risk. The Bank is continuously enhancing its internal processes and capabilities as this topic matures.

Furthermore, we acknowledge the clear synergies between climate stress testing and our commitment to decarbonise our portfolio, with both requiring advancements in capturing granular customer-level data.

We will review our operating model for stress testing and scenario analysis on an annual basis to ensure alignment with prevailing regulatory requirements and the adoption of industry best practices. This ongoing enhancement aims to achieve greater sophistication in quantifying both transition and physical climate risks.

Operations and supply chain

Net zero operations

Why it matters

Increasing the use of clean energy and reducing water consumption are critical to the success of the national drive towards a net zero economy. From electricity and water-saving practices to effective waste management, the Bank is committed to reducing its environmental impact and monitoring resource consumption across its branches, offices, and data centres.

ADCB's approach and progress

ADCB Group complies with all relevant environmental laws and regulations in the jurisdictions in which it operates. To ensure continuous improvement, ADCB seeks to establish environmental management systems across the Bank's locations. In 2025, the Bank continued to reduce its environmental footprint, focusing on assessing energy efficiency initiatives within its operations.

The Bank is committed to managing its environmental responsibilities and enhancing environmental performance through the implementation of the ADCB Environmental Statement. This establishes a structured environmental framework covering all operational activities across ADCB's UAE locations. It supports the Bank's climate strategy by promoting energy and natural resource efficiency in line with our commitment towards net zero in operations.

Energy

As part of ADCB's drive to reduce energy use, the Bank has continued to implement a diverse range of initiatives.

Office buildings

ADCB has entered into a 10-year shared energy saving contract with RESET, an Energy Services Company (ESCO) for the implementation of energy saving measures in its three office buildings in Abu Dhabi. The energy saving initiatives implemented included establishing building management systems for the three buildings, replacing chillers in two of them, and existing lighting with energy saving alternatives.

In addition, as part of the Bank's ongoing sustainability initiatives, all renovated and new branches are fitted with water and electricity conservation measures, such as motion sensor lighting in enclosed offices and flow reducing aerators on water taps.

Since implementation of the energy conservation measures in March 2024, ADCB has realised significant savings in both energy consumption and costs.

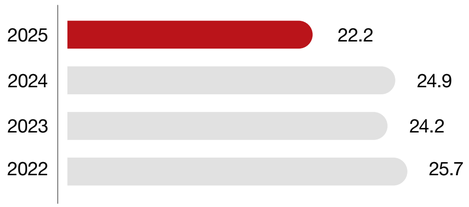
Information technology

ADCB has adopted a comprehensive cloud strategy that includes a structured framework for cloud migration, modernisation, and governance. This approach ensures that cloud adoption aligns with the Bank's business objectives, regulatory requirements, and sustainability goals. The strategy emphasises scalability, agility, resiliency, and innovation.

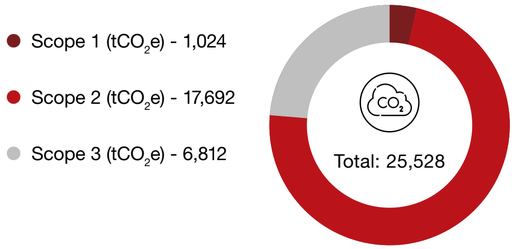
Cloud adoption is crucial to ADCB's strategy as it drives sustainable digital transformation, enhances operational efficiency, and improves customer satisfaction. By leveraging cloud technologies, ADCB can scale operations, innovate rapidly and maintain a competitive edge in the banking industry, while reducing its carbon footprint.

ADCB has migrated a significant portion of its workload to the cloud by the end of 2025, helping reduce key metrics such as the Bank's carbon footprint, energy usage, and resource consumption.

Energy intensity (GJ/FTE)[1][2]



Total GHG Emissions (tCO_2e)[3]



(1) Energy intensity covers electricity and fuel consumption within the organisation
(2) The boundary of reporting was expanded in 2024 & 2025 to include electricity and fuel consumption from branches in ADCB Egypt and therefore the reported figures are not comparable with the prior year (2022-2023) figures
(3) Reported in tonnes of carbon dioxide equivalent



SPOTLIGHT

Green building certification (EDGE) for ADCB Egypt

ADCB Egypt's decarbonisation efforts place strong emphasis on improving the environmental performance of its premises and expanding the adoption of green building practices. By transitioning branches toward internationally recognised green building standards, the Bank supports the growing demand for sustainable infrastructure in Egypt and contributes to broader market awareness of energy- and resource-efficient buildings.

Building on the progress achieved in 2024, ADCB Egypt continued to advance its green building programme in 2025, securing EDGE (Excellence in Design for Greater Efficiencies) certification for additional branches. As a result, 20 Bank premises are now EDGE certified, representing approximately 40% of ADCB Egypt's total premises.

Awarded by the Green Business Certification Inc. (GBCI), this certification is a testament to ADCB Egypt's commitment to sustainability. EDGE, developed by the International Finance Corporation (IFC) and managed by GBCI, focuses on driving energy, water, and material efficiency in buildings to meet high environmental performance standards.

EDGE certified branches in ADCB Egypt

20

Net zero operations (continued)

Paper

ADCB has observed a significant reduction in volumes of printed paper across the organisation, highlighting a successful shift toward digital workflows and more sustainable operations. This transition has delivered tangible benefits, including: cost savings, environmental impact, operational efficiency.

This progress was driven by the following key initiatives:

- Migration of multiple departments to digital document management systems
- Organisation-wide adoption of e-signature solutions
- Ongoing awareness campaigns promoting paperless practices

In addition, the Bank continued to reduce the number of printers and their use in our buildings. All printers are programmed to enter ‘sleep mode’ from 5 pm to 7 am every day, which has reduced the daily power consumption of printers.

Key customer initiatives to reduce paper consumption

In 2025, ADCB digitised onboarding and lending journeys using facial biometrics, document scanning, and e-signatures, eliminating manual paperwork and reducing branch traffic. These initiatives directly cut paper consumption and support a lower-carbon, more efficient operational model in our branches.

In addition, ADCB’s digital-first application for SME clients has sharply reduced reliance on paper-based processes, further lowering resource consumption.

Reduction in paper printed for office use in ADCB UAE when compared to 2024

28%

Waste and recycling

ADCB has well-defined procedures for collecting, sorting, and disposing of the general and recyclable waste it produces. The Bank employs an approved environmental services provider to collect and dispose waste (both general and recyclable) in line with guidelines from Tadweer, the Abu Dhabi waste management company.

The Bank is committed to reducing the amount of waste it produces and its contribution to landfill and disposal sites. We encourage this through the installation of separate recycling and general waste bins, together with a variety of in-house initiatives to segregate bottles and cardboard from general waste.

IT asset recycling & reuse

ADCB achieved a measurable reduction in electronic waste in 2025 through:

- Consolidation and decommissioning of underutilised hardware
- Shift to cloud-based and digital solutions
- Awareness efforts encouraging responsible IT equipment disposal and reuse

A significant reduction in electronic waste was achieved through the strategic co-location of IT teams and staff from multiple offices. This initiative enabled the Bank to clear approximately 10 tonnes of IT equipment, with reusable assets redeployed within the new digital hub in Abu Dhabi. Equipment that could not be reused was responsibly managed at end of life through environmentally responsible recycling processes, delivered in partnership with certified e-waste recycling providers.

Electronic waste recycled in 2025(1)

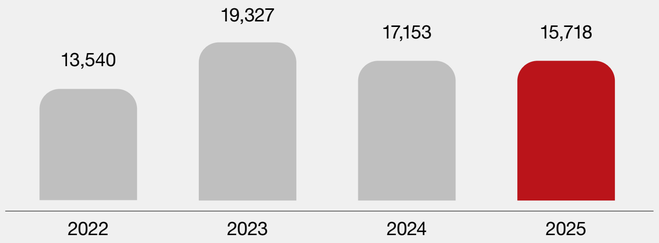
20 tonnes

Water

ADCB uses water from municipal sources in all its locations, ensuring water consumed is discharged for recycling. The Bank has installed water efficient fixtures and fittings within certain offices, which has successfully reduced water consumption. As part of the Bank’s ongoing sustainability initiatives, all renovated and new branches are fitted with flow reducing aerators on water taps.

At ADCB’s data centres, water is used responsibly to control temperatures for optimised equipment cooling. By drastically reducing the number of on-premises servers in data centres, the Bank has also reduced water consumption, with wastewater safely discharged back into the municipal water network for recycling.

Water intensity (m^3/FTE)(1)



(1) Reported for ADCB Group (excluding our subsidiaries in Egypt and Kazakhstan)

Green procurement and supply chain

Why it matters

A sustainable supply chain is a key component in reducing ADCB's environmental impact, as well as helping to ensure it sources ethical goods and services. The Bank is also committed to improving working conditions and to increasing operational efficiency in the supply chain.

ADCB's approach and progress

The Bank's approach to supply chain management is covered under the Group Procurement Policy. ADCB has integrated environmental and social criteria within its procurement policies and processes to identify, assess and manage the associated risks accordingly.

ADCB expects its suppliers to comply with local laws and regulations and abide by its Vendor Code of Conduct. This also includes a request for documentation of code adherence, reinforcing the vendor's commitment to sustainable practices.

In managing existing and potential suppliers, the Bank considers the vendor's approach to business ethics and any policies that cover gifts and benefits, anti-bribery and corruption, and information security and data privacy, among others. Vendors must comply with the Group's relevant sustainability principles, including environmental responsibility, human rights, diversity, equal opportunities, and occupational health and safety.

Vendor Code of Conduct

All suppliers must comply with the Bank's Vendor Code of Conduct. As well as adhering to applicable laws and standards, the Code requires all suppliers to:

- take active steps to disclose and manage any actual, potential, or perceived conflicts of interest concerning their engagement with the Bank
- comply with privacy and data protection laws to protect the Bank, customers and employees
- take steps to reduce their environmental impact, while creating a positive social impact through their products and services
- have robust business continuity capabilities in place
- adopt fair and ethical employment practices and take appropriate steps to identify and reduce risks of child labour and modern slavery in their supply chain
- pay a pre-defined minimum salary to their employees according to local labour law and regulations
- notify the Bank of any security incident that may affect data or assets

Please click here for the **Vendor Code of Conduct**



SPOTLIGHT

ESG questionnaire as part of vendor registration process

As part of the Bank's sustainable procurement plan, ADCB has introduced an ESG questionnaire in place within the vendor registration process. This key initiative is applicable to all new and existing vendors and serves as a foundational tool for assessing supplier alignment with the Bank's sustainability objectives. The questionnaire captures critical information such as:

- **Environmental:** Existence of environmental or sustainability policies, reporting on green initiatives undertaken, and disclosures of Greenhouse Gas (GHG) or carbon emissions. Third-party assurance of emissions data is encouraged as a best practice
- **Social:** Vendor compliance with UAE labour laws, registration with the Ministry of Human Resources and Emiratisation (MoHRE), including Emiratisation targets, participation in the Wages Protection System (WPS). Vendors based outside the UAE are also expected to comply with similar regulatory mandates
- **Governance:** Code of Conduct or Ethics, including policies on human rights and modern slavery, with supporting documentation where applicable. Additionally, suppliers are asked to outline measures in place to prevent corruption, bribery, and unethical practices

In addition to the ESG questionnaire, ADCB also integrates climate risk assessments for vendors as part of the Third-Party Risk Management Policy.

For details on **climate risk assessment for vendors** please refer to page 44 of this report

Partnerships in the supply chain

ADCB collaborates with a number of strategic partners to advance its green procurement strategy. The Bank regularly monitors and evaluates the market to expand the network of external ESG partnerships that match the organisation's strategic priorities.

Mastercard Sustainable Card Programme

Through the Mastercard Sustainable Card Programme, all cards are verified for their recycled content by the Card Eco Certification (CEC) Scheme.

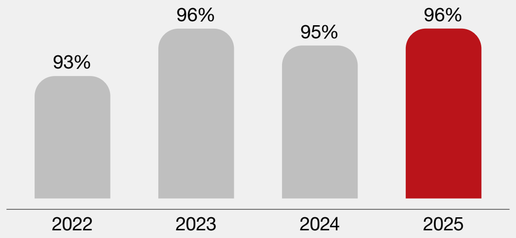
The latest CEC Statement of Compliance confirmed that ADCB's plastic cards are made of 86% recycled Polyvinyl Chloride (PVC) material, while the metal cards contain 65% recycled material.

Local procurement

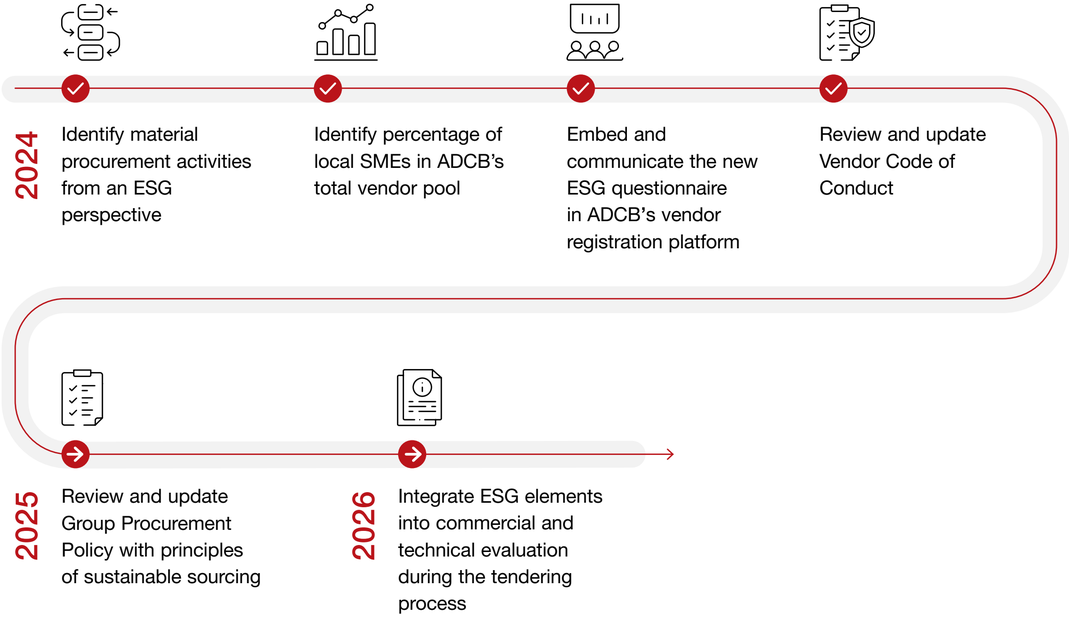
The Bank actively seeks to partner with local suppliers, with 96% of its procurement budget spent locally in the UAE.

In Egypt and Kazakhstan, the Bank takes a similar approach and will continue to work closely with local suppliers, actively engaging with them on relevant ESG issues.

Percentage of the procurement budget spent on local suppliers



Sustainable procurement plan - 2024 and beyond



Total number of local suppliers

1,600+

Recycled PVC material in plastic cards

86%

Customers and communities

56 Customer satisfaction
60 Financial inclusion
63 AI and digital transformation
67 Community investments



Customer satisfaction

Why it matters

The needs and aspirations of our customers remain central to decision-making at ADCB. Customer satisfaction is a key measure of success for the Group, representing both a strategic opportunity – building loyalty, advocacy and market share – and a potential risk if service expectations are not met. The Bank actively engages with customers and seeks feedback on its services, products and channels to identify areas for continuous improvement.

Bank-wide Net Promoter Score (NPS)

80

Service Quality Forums convened in 2025

40

New services launched through mobile and internet banking

15

ADCB's approach and progress

At the heart of ADCB's approach to customer satisfaction is the Customer Experience Committee (CX Committee), chaired by the Group Chief Executive Officer (GCEO). Meeting quarterly, the Committee brings together leaders from across the Bank to review performance indicators, address service gaps and track progress until outcomes are achieved. Elevated to a formal Management Executive level committee in 2024, the CX Committee underscores ADCB's focus on customer outcomes at the highest levels of decision making.

Complementing this leadership focus, 'Service Quality Forums' are held for each Group Head to drive performance and efficiency through rapid process improvement. In 2025, 40 forums were convened, resulting in initiatives such as the 'Branch Efficiency Programme' and the redesign of payment and collections processes that delivered operational efficiencies and enhanced customer experience.

Through its Voice of the Customer (VoC) programme, ADCB integrates customer perspectives on product design, communications and digital enhancements. Nine sessions were held in 2025, ensuring that feedback and customer sentiment directly informed service design and delivery.

The enduring commitment to service excellence is embedded across every aspect of the business. Each customer-focused initiative begins with a defined charter outlining accountabilities, milestones, and outcomes. Service excellence metrics form part of every employee's KPIs, reinforcing the shared responsibility for delivering outstanding experiences across the Bank. This structured governance framework for service excellence highlights ADCB's unified approach and the drive to embed continuous enhancement across all operations.



Top-rated UAE banking brand

Industry recognition by Brand Finance

Note: Figures in this section refer to ADCB UAE only, unless stated otherwise

Measuring what matters

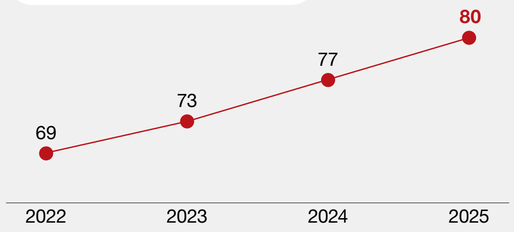
ADCB takes a holistic approach to measuring customer satisfaction. The Bank monitors a blend of Net Promoter Score (NPS) and complaint resolution time across multiple channels, customer segments and product lines to ensure consistency and objectivity, with customer feedback collected through a range of channels.

The Bank's NPS has increased progressively in recent years to reach 80, in the top tier for customer advocacy globally, reflecting continued strength in digital-journey satisfaction and relationship management. The Bank's singular focus on customer experience continues to translate into exceptional market recognition. In 2025, ADCB was also rated the strongest banking brand in the UAE for the second consecutive year by Brand Finance in its global report that featured 500 banks.

The Bank also ranked sixth overall in the UAE in KPMG Customer Experience Excellence 2025 report, retaining its status as a leader within the financial services sector.

Net promoter score (NPS)[1]

80 +11 since 2022



Continuous improvement from feedback

Customer feedback is a key driver of service improvement and operational sustainability. A typical feedback journey starts from the customer reaching out via our front-end channels to report a problem they have encountered. This is registered as a complaint. ADCB encourages first-point-of-contact resolution by empowering customer service teams with the tools and knowledge to enable them to serve customers promptly.

Customer feedback is also gathered through surveys across mobile, contact centre and branch interactions, providing granular insights into customer perceptions. This data is analysed by the Customer Experience Care Team to identify opportunities for improvements and service gaps.

All customer feedback is regularly reviewed and assessed through various platforms, including the CX Committee and VoC forums, service quality forums, and semi-annual updates to the Board.

For further details on **ADCB's service promise** please click here

Decrease in customer complaints[2]

9%

Structured complaint resolution framework

ADCB is committed to delivering high standards of customer service and ensuring that customer feedback and concerns are addressed transparently, fairly and in a timely manner. Customers can contact the Bank through multiple accessible channels, including the 24/7 call centre, branch network, website, internet banking, mobile application and social media platforms.

The Bank maintains a structured complaint resolution framework, with frontline teams empowered to resolve issues promptly and more complex matters escalated to Customer Care Team and the Complaint Management Unit. Technical or process-related issues may be referred to relevant teams and specialised re-engineering units for root cause analysis and long-term improvements.

The Bank aims to resolve complaints within three business days and maintains proactive communication throughout the process. In 2025, 95% of complaints were resolved within this timeframe, reflecting a continued focus on service quality and customer satisfaction.

Customer feedback and trends are consolidated and presented to the Voice of Customer (VoC) forum to inform cross-functional improvements, with oversight provided through quarterly GCEO-led CX Committee reviews and semi-annual reporting to the Board Audit Committee. Customers who remain dissatisfied following internal resolution processes are informed of their right to escalate their complaint to Sanadak, the independent ombudsman, for impartial review.

Compliant resolution process

1. **Registration**
   Complaint registration through multiple channels, including call centre, branch network, website, internet banking, mobile application and social media platforms
2. **Acknowledgement**
   Done within 1 business day through SMS and email
3. **Investigation**
   The complaint is investigated with input gathered from relevant departments where required
4. **Resolution**
   Contact the customer to provide updates on decision taken and complaint resolution. Written response sent to the customer by email
5. **Escalation**
   Inform the customer of their rights to escalate their complaints to Sanadak, if they are unsatisfied with the decision taken for complaint resolution

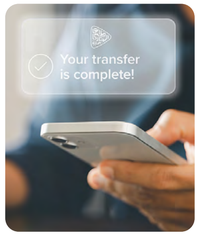
(1) NPS: Net promoter score is based on the likelihood that customers will recommend ADCB to family or a friend. NPS is calculated as the percentage of customers who are promoters, rating ADCB a 9 or a 10 on a 0 to 10 point scale, minus the percentage who are detractors, rating it a 6 or lower. This applies to ADCB UAE only
(2) Reported for ADCB Group. Based on the comparison of 3-year rolling average of customer complaints for the reporting year when compared to the previous reporting period

2025 key service excellence initiatives



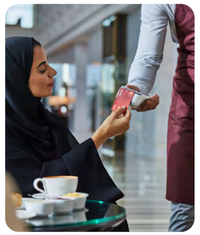
Branch efficiency programme

Central to ADCB's service excellence agenda in 2025, this initiative enhanced in-branch productivity and accelerated digital enablement, delivering a seamless, high-quality experience across every channel.



QR code verification for fraud protection

The introduction of QR code-enabled clearance letters allows instant verification of document authenticity, reducing fraud risk and building trust.



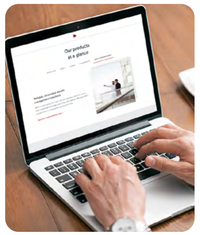
Payments and collections revamp

The payments process was overhauled to boost operational efficiency and strengthen corporate offerings. Digitally enabled changes to collections improved customer experiences, particularly in fraud and dispute resolution.



Streamlined card dispute resolution

The card dispute process was redesigned for greater speed and transparency, eliminating lengthy forms and simplifying outcomes for customers.



AI-driven customer service

Artificial intelligence underpins ADCB's customer service, enabling faster, more consistent, and personalised interactions. AI supports workflow automation and customer-journey analytics, helping anticipate needs, resolve bottlenecks, and improve efficiency.



'Customer Journey Design Centre of Excellence' (CoE)

The CoE unites expertise from across the organisation, applying structured, end-to-end service design to foster customer-centered innovation, accountability, and continuous improvement.

For further information please refer to ADCB 2025 Annual Report

Ethical approach to banking

As part of its ethical banking ethos, ADCB ensures alignment with CBUAE Consumer Protection Standards (CPS) and international best practices. This approach underscores the Bank's commitment to responsible and customer-centric banking.

The Bank ensures all applicable disclosure and transparency requirements are complied with for all products and services, and through all communication channels. Customers are provided with a Key Facts Statement (KFS) for the financial products or services they have applied for. This includes information on the benefits, risks, fees and terms of the products and services in question. The Bank regularly reviews the information provided to ensure it is timely, accurate and sufficient to enable customers to make informed decisions.

In addition, the Bank promptly informs customers of all important changes, such as interest rates and terms and conditions changes; and ensures that information is timely, up-to-date and provided at each stage of the contractual process to ensure informed decision-making. The Bank also provides repayment schedules, product and account statements at regular intervals to customers.

Please click here for
ADCB's Key Facts Statement
for products or services

Responsible marketing and selling practices

ADCB adheres to the business conduct principles set out in the UAE Consumer Protection Standards (CPS) regarding marketing and promotional activity. The Bank ensures that all direct contact with consumers for the purpose of marketing and promotion complies with all applicable laws and consumer preferences. Unless consumers explicitly consent to 'opt in', they are deemed to have 'opted out' of all promotional communication.

ADCB has established a range of policies, procedures, controls, and training to assist employees in applying a consistent approach to determining the financial needs and objectives of consumers, as well as determining the appropriateness, suitability, and affordability of products. Employees are trained to meet customer needs and avoid applying undue pressure to purchase, switch any financial product or service, or engage in marketing or sales conduct that is in any way misleading or may be construed as deceptive.



Please click here for the Bank's **Responsible Marketing Statement**

In 2025, ADCB published its Responsible Marketing Statement, establishing guidelines to ensure that all marketing efforts maintain transparency and trust with our customers, in a manner that is compliant with our legal and regulatory obligations. The Statement applies across ADCB Group operations and covers all employees, vendors, and third-party agencies involved in marketing and communications activities.

This promotes responsible, consistent, and transparent marketing practices that support informed customer decision-making and protects the Bank from reputational risk. Marketing communications are required to be accurate, clear, fair, and balanced, providing equal prominence to product benefits, risks, and costs, in line with the Consumer Protection Regulation (CPR) issued by the Central Bank of the UAE.

ADCB has also implemented a consumer protection marketing checklist to ensure all marketing and promotional materials are developed in line with CPS requirements. Marketing and disclosure practices follow strict ethical standards, with products designed to be inclusive and accessible to all, including vulnerable groups.

In order to prevent greenwashing, any offering marketed with sustainability-related claims, undergoes a pre-approval process to ensure that it meets eligibility criteria as per ADCB's Sustainable Product Framework, supported by credible data (where available), and disclosures on environmental or social impacts.

Customer-facing employees trained in responsible banking and marketing practices(1)

83%

(1) ADCB UAE only

Customer debt management

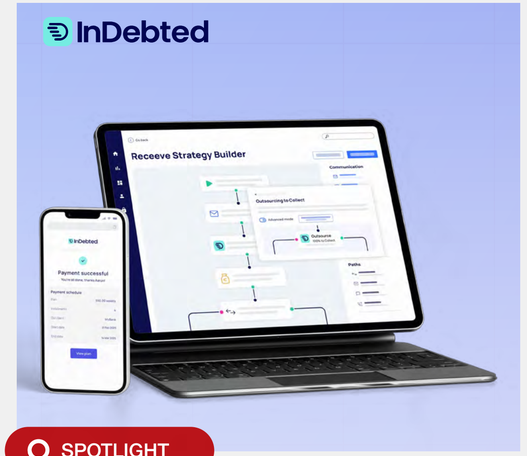
The Bank aims to help customers resolve any payment issues swiftly, assess financial challenges, and offer debt counselling on repayment solutions. If a customer misses a payment, ADCB initiates contact to understand the underlying cause, whether operational or financial. Specialists in debt management conduct a holistic and objective assessment of each case and propose tailored solutions. These may include payment deferment, tenure extensions, revised repayment terms or consolidation of facilities into affordable instalment plans.

We are committed to treating all customers fairly, irrespective of their background or financial status. Special attention is given to vulnerable groups to ensure they are not disadvantaged during the collection or counselling process. The Bank's dedicated Debt Collection Team undergoes specialised training on topics such as empathetic and respectful debt counselling practices, CBUAE consumer protection guidelines, and data privacy and responsible handling of customer information.

Customers are also regularly informed via email and SMS regarding their missed payments to educate them on the impact of non-payment on their credit score and outline the potential legal consequences of continued default.

A comprehensive guide to debt counselling and debt management tools is also available on the ADCB website. This resource is shared with customers via email and reflects our commitment to responsible debt management.

Please click here for **Debt management guide** for customers



SPOTLIGHT

Strategic partnership with InDebted

A strategic partnership was announced between ADCB's subsidiary Meedaf (an innovation-driven financial services holding platform) and InDebted (the global leader in AI-powered collections infrastructure). This collaboration includes an investment in InDebted's UAE entity to accelerate regional expansion. By combining Meedaf's regional expertise with InDebted's empathy-led, technology-driven approach, the partnership sets a new benchmark for innovation in debt resolution and financial wellbeing. The strategic partnership will accelerate expansion into banking, financial services, government, and telecommunications, while strengthening regional operations by establishing a UAE hub.

Financial inclusion

Why it matters

Financial inclusion empowers individuals and businesses by providing access to a range of affordable products and services that meet their needs. Financial access, delivered in a responsible manner, makes managing day-to-day living easier and helps families and businesses achieve their long-term goals.

ADCB's approach and progress

ADCB actively supports the growth of Small and Medium-sized Enterprises (SMEs), microbusinesses, and entrepreneurs by providing access to finance and improving financial inclusion. We promote financial education to improve skills and knowledge on sound financial planning and management. The Bank issues email communications and financial education articles on; budgeting, saving for retirement, payment options, money transfer options and guides on avoiding financial fraud and scams.

Access for lower income customers

ADCB aims to ensure customers have access to financial products and services that are suitable for their circumstances. The Bank's Express Loan is a short-term credit facility designed to serve pre-qualified customers with monthly incomes below AED 5,000. This product directly supports ADCB's objective to offer accessible and responsible credit to people who may otherwise have limited access to formal financial services.

The Bank is refocusing its approach to the mass segment to drive stronger profitability and sustainable value creation. The strategy prioritises stronger, higher-value relationships, supported by greater automation and a fully digital service model. Relationship-based pricing and revised fee structures are being introduced to reward engagement.

Customers engaged through the consumer education and awareness platform[1]

490k+

Digital account openings by unbanked or underbanked customers[2]

250k+

Consumer education and awareness

ADCB's Consumer Education and Awareness Team is responsible for the implementation of consumer education programmes for its customers.

The Bank's consumer education and awareness platform serves as the central hub for all the Bank's educational assets, as well as being a one-stop shop for customers to access valuable, relevant information on diverse financial topics. This financial awareness digital platform provides customers with information and insights to empower them to make more informed decisions in their financial education journeys. Platform content includes articles, infographics, tutorial videos, snapshots and interactive quizzes.

ADCB implemented a comprehensive consumer education plan in 2025. Topics covered in the plan included expense management through effective budgeting, managing inflation in investment or as a small business, understanding Islamic banking, navigating mobile banking platforms, debt management, among others.

To promote responsible management of personal finances, ADCB added significant new content in 2025, including 90 educational videos, articles, and infographics in English and Arabic. The Consumer Education and Awareness Team also partnered with ADCB GlobalLinker to expand financial education outreach to SMEs, helping business owners strengthen their financial capabilities and contribute to inclusive economic development.

ADCB's consumer education and awareness platform gained strong traction during the year, with over 493,000 unique users spending an average of 1.23 minutes per page, and over 208,000 users returning to the platform for further information.



SPOTLIGHT

Educating customers on digital banking

As part of the Bank's commitment to advancing financial literacy and inclusive access to banking services, the Consumer Education and Awareness Team delivered targeted training to more than 420 frontline employees. The programme focused on ADCB's mobile banking self-service capabilities, equipping staff to support customers in managing their day-to-day banking needs independently. This supports greater financial empowerment, improves service accessibility, and encourages wider uptake of digital banking.

Please click here for **ADCB's consumer education and awareness platform**

(1) Reported as unique users for ADCB UAE only
(2) Includes the number of accounts for individuals through the digital onboarding app 'Hayyak' with a minimum salary of AED 5,000 per month in ADCB UAE

Small and medium-sized enterprises (SMEs) and micro-businesses

SMEs and micro-businesses play a vital role in driving the growth of the UAE economy. ADCB empowers these critical businesses by providing access to a range of products and services to promote greater financial inclusion.

ADCB supports more than 170,000 clients in the SME and micro-business segments with a full suite of financial services, including asset and liability products, cash management, trade finance and more.

In 2025, the Bank reinforced its position as a major bank for SMEs in the country, onboarding c.39,000 new clients. Beyond financing, the Bank provides a comprehensive suite of products and services, including transaction banking services, working capital financing, trade finance, and foreign exchange facilities. A core differentiator of ADCB's SME proposition is the relationship-led coverage framework and a hub-and-spoke structure that provides streamlined access to trade finance, foreign exchange and treasury expertise. This approach ensures consistent service quality as clients grow, enabling a smooth progression from micro-business to SME and into the corporate segment.

Key account products underpinning ADCB's SME proposition have also served to attract significant deposits, contributing to low-cost funding for the Bank. During the year, current and savings account (CASA) deposits from SMEs expanded by 22% to AED 28 billion.

SME CASA deposits

AED 28 bn +22% YoY

SME and micro-business clients

170,000+

ADCB's SME proposition is anchored in a digital-first operating model, complemented by a relationship manager structure that provides high-quality advice and day-to-day guidance for clients. At the centre of this offering are the Bank's core digital transaction platforms, ProCash and ProTrade, which deliver integrated cash and trade management capabilities, enabling end-to-end processing with minimal manual intervention.

In 2025, ADCB expanded digital product journeys supported by deployment of a digital signature capability for remote execution for loans and sub-account opening. Among other enhancements, the Bank introduced a dedicated digital workflow to allow customers to raise bank guarantee requests directly through the ProCash digital platform, helping to streamline this critical working capital process.

The micro-SME segment is a strategic priority for growth for ADCB. In 2025, the Bank continued to grow its customer base in the segment, supported by digital onboarding and self-service tools, with premium clients served by relationship managers. ADCB continues to expand this segment through enhanced coverage, targeted incentives and collaboration with national SME initiatives such as Khalifa Fund for Enterprise Development and Mohammed Bin Rashid Establishment for SME Development (Dubai SME).

For micro-business clients, ADCB provides customised financial services including 100% cash margin-backed facilities and simplified working capital products based on bank statement assessments, designed to meet the specific needs of smaller enterprises.

PacePay for digital payments & collections

PacePay, a key ADCB initiative supporting micro businesses and SMEs, continues to sustain its success, providing companies with a straightforward and cost-effective solution for accepting customer payments through mobile phones. In 2025, the Bank conducted a major upgrade of the PacePay platform to provide an expanded suite of digital payment and collection capabilities. Enhancements include broader acceptance options, such as payment links, QR codes and tap-on-phone functionality, as well as an improved merchant dashboard that offers real-time transaction visibility and performance insights. PacePay's role as an accessible, low-cost alternative to point-of-sale hardware continued to strengthen, with merchant numbers increasing by 11% and transaction volumes up by 50% from the previous year.





SPOTLIGHT

Developing the UAE's start-up ecosystem

Reflecting the Bank's commitment to the UAE's fast-growing start-up economy, ADCB has launched a strategic collaboration with the Khalifa Fund for Enterprise Development, supporting over 200 start-ups and fostering the growth of the country's entrepreneurial ecosystem. This commitment is also evident in ADCB's partnership with Emirates Development Bank (EDB), which enables the Bank to provide targeted financial services to strategic and high-impact segments, including renewables, healthcare, advanced technology, and food security.

In 2025, through a strategic collaboration with HUB71 and Abu Dhabi Global Market (ADGM), ADCB launched exclusive loan and financing offers along with tailored Business First packages for ADGM clients, resulting in over 130 customer onboardings during the year.
In addition, the SmartStart account, designed for smaller businesses and startups, enables entrepreneurs to establish banking relationships with ease. This product accounted for approximately 25% of new SME account openings in 2025, highlighting the Bank's appeal to a new and rapidly growing generation of entrepreneurs.

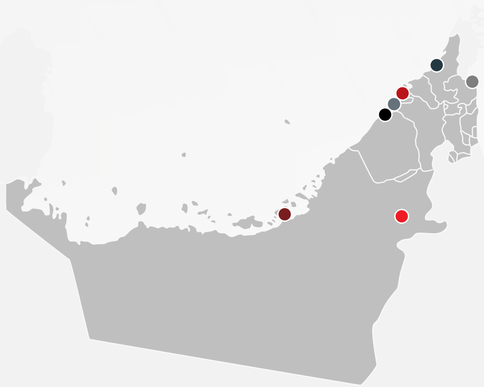
Accessibility

ADCB continually monitors the accessibility of the Bank's branches to make facilities more inclusive. Accessibility measures implemented include installing access ramps and adjusting the height of ATMs in 11 branches to make them more accessible for People of Determination (POD).

The Bank provides mandatory training to equip staff with the understanding and insights to welcome, guide and service people of determination in the branches. Voice guidance for ATM transactions has also been introduced to provide further support for POD customers.

ADCB's 11 POD-friendly branches

- **Abu Dhabi:** Al Hosn, Dalma Mall, Musaffah
- **Ajman:** Ajman
- **Al Ain:** Hazza Bin Zayed Stadium
- **Dubai:** Al Karama, Arabian Center
- **Fujairah:** Dibba, Fujairah
- **Ras Al Khaimah:** Ras Al Khaimah
- **Sharjah:** Al Buhaira



ADCB's accessibility features

- Tactile floor indicators
- Ramp and handrails
- Steps
- Dedicated parking slot
- Accessible entrance doors
- Wide doorways
- Low height teller counter
- Low height CSO counter
- Low height cheque desk
- Physical security
- Lights adjustment
- POD dedicated waiting area
- Emergency exit
- Hearing induction loops(1)
- Job aids(1)

(1) Assistive equipment available across all branches



SPOTLIGHT

Supporting Financial Inclusion through the Erada Programme

In 2025, ADCB Egypt significantly strengthened its financial inclusion efforts for People with Disabilities (PwDs) through employment-driven initiatives.
In collaboration with the Ataa Fund, the Bank opened 13 Erada Packages for PwDs, enabling direct access to small income-generating projects that promote sustainable livelihoods.

The Bank further expanded its reach through the Training for Employment programme, implemented in partnership with Misr El Kheir and the Elsewedy Foundation, opening an additional 100 Erada Packages that provided tailored financial tools, practical training, and professional mentorship to support meaningful integration into the labour market.

The success of these initiatives is reflected in the Erada Programme's growth to 513 customers in 2025, a 30% year-over-year increase, with 522 active accounts by year-end.

AI and digital transformation

Why it matters

Artificial Intelligence (AI) and digital transformation are reshaping how ADCB serves customers and strengthens long-term competitiveness, combining advanced technology with data-driven insight to deliver seamless, tailored experiences. A programme of automation, cloud migration and AI innovation is also improving resilience and operational performance, supported by partnerships with fintechs, leading technology providers and national platforms.

ADCB's approach and progress

AI transformation programme

In October 2025, ADCB announced the launch of a strategic transformation programme, embedding AI at the core of its business model as a key catalyst in delivering the Bank's five-year strategy.

To deliver on this ambition, the Bank has launched a comprehensive roadmap for an at-scale AI transformation. The plan consists of more than 150 AI use cases being activated at an accelerated pace over the coming years, supported by significant investments in infrastructure, cloud capabilities, and robust data foundations.

Customers are set to benefit from faster, more personalised, and seamless experiences, ranging from instant decisions and proactive insights to hyper-personalised product offerings and always-on intelligent support.

ADCB has mobilised dedicated leadership and delivery capacity to drive this transformation forward. A Chief AI Officer now leads a specialised team focused on execution across all lines of business.

The Bank has formed strategic partnerships with global technology leaders to accelerate the integration of AI into day-to-day decision making and delivery, including collaboration with Microsoft, Amazon Web Services (AWS) and G42.

Efficiencies & productivity gains by AI

Transforming the Bank's operating and business model

- Service model automation, enabling self service and straight through processing (STP)
- Strengthened risk and compliance capabilities
- Streamlined internal front-office and back-office processes

Revenue generation enabled by AI

- AI-led sales model, with enhanced customer relationship management (CRM), data intelligence and hyper-personalised targeting
- Service model with experience reimagined through AI, integrated across all channels

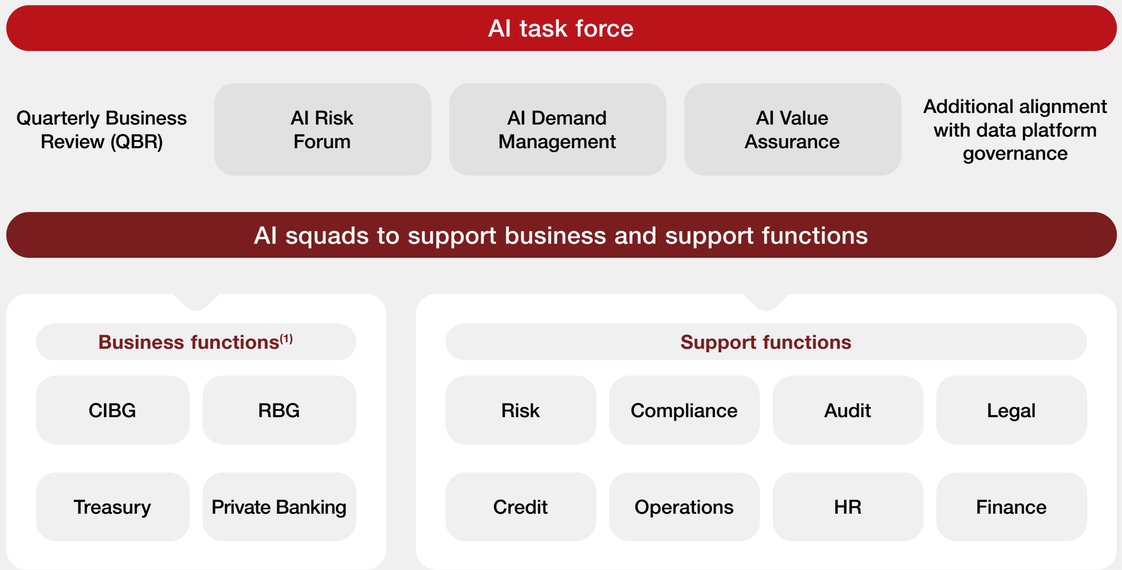
Governance and responsible adoption

The Bank remains firmly committed to using AI responsibly and to adopting it in a safe, secure and accountable manner. Three management-level governance forums have been established with representation from the executive leadership team:

- **AI Risk Forum:** reviews AI use cases against the Bank's AI risk principles, and ensures they are trustworthy
- **AI Demand Management Forum:** evaluates and prioritises proposed use cases before approval
- **AI Value Assurance Forum:** validates financial impact, progress and delivery against approved business cases

In addition, ADCB's Gen AI Policy ensures the legal and responsible use of generative AI technology within the Bank and across its information assets.

AI Governance Framework



(1) CIBG: Corporate and Investment Banking Group; RBG: Retail Banking Group

Intelligent innovation in action: select AI use cases

Board Observer

Intelligence for strategic decision making

‘Board Observer’, a GenAI-powered assistant, is supporting executive and board-level decision making and governance oversight. Operating securely within the Bank’s internal environment, the system complements and facilitates in-room discussion by providing leadership with instant access to insights based on previous discussions as well as relevant external information. Board Observer strengthens institutional memory and supports efficient governance.

Credit Companion

Supporting rapid data-driven credit processes

ADCB has introduced ‘Credit Companion’, a generative AI assistant designed to support efficient credit processes. The tool analyses, structures and summarises complex deal documentation, extracting key risks, financial indicators and decision relevant insights, and responding to targeted, case specific queries. Operating securely within the Bank’s internal environment, Credit Companion functions as a real-time digital assistant enabling consistent and data-driven credit decision-making.

Enterprise Knowledge

Enhancing the compliance culture

The launch of ADCB’s ‘Enterprise Knowledge’ marks a major step in empowering employees through the responsible use of AI. Powered by a secure voice-enabled generative AI model hosted within ADCB’s internal network, the platform provides instant access to thousands of internal policies and procedures, as well as external regulatory documents issued by UAE authorities. Operating in English and Arabic, Enterprise Knowledge strengthens accountability, enhances the Bank’s compliance culture and supports confident, well-informed decision-making across the organisation. The tool is being further developed to support a wide range of productivity enhancing use cases across the Group.



SPOTLIGHT

Responsible innovation: Protecting ADCB in the digital era

Technological transformation is propelling growth and innovation across the Bank, and the Risk Management function is playing a key supporting role, ensuring the responsible adoption of artificial intelligence. As AI becomes increasingly embedded in decision-making, ADCB is focused on strengthening oversight, anticipating new exposures and implementing effective controls to mitigate potential risks.

In 2025, the Bank advanced its management of digital and AI-related risks by embedding them into the enterprise risk framework and mapping emerging AI risks, such as prompt injection, model bias and explainability gaps, into traditional risk categories. Within ADCB’s ‘responsible AI principles’, each model is subject to bias testing, validation, and independent oversight to ensure safe application.

The AI Risk Forum brings together a number of permanent members, including the Acting Group Chief Risk Officer and Chief AI Officer, with invited representatives from across the Bank, notably the key business sponsors of AI use cases. Its principal role is to provide structured oversight for all AI and machine learning systems, ensuring alignment with UAE and global regulatory standards, promoting fairness, transparency and accountability in AI applications across operations and customer interactions.

ADCB's approach and progress

Digital transformation

ADCB has accelerated its digital transformation agenda in 2025, achieving tangible gains in digital sales, automation, data-driven innovation and customer engagement. In particular, the Bank started the establishment of next-generation platforms and digital architecture to support rapid AI adoption, which is central to delivering significant gains in operational efficiency and service excellence in the years ahead.

To accelerate transformation, two new digital hubs have been established in Abu Dhabi and Dubai, bringing together IT and digital specialists to enable agile delivery and collaboration. This operating model unites technology and business teams into smaller, cross-functional units focused on enhancing specific customer journeys.

In 2025, ADCB sustained market-leading digital activity and surpassed global benchmarks, with 1.9 million customers registered across internet and mobile banking platforms, representing 93% of ADCB's customer base. Digital transactions grew significantly, while reliance on branches and call centers continued to decline. The Bank recorded strong gains in digital adoption across credit cards and loans, supported by substantial improvements in straight-through processing (STP), reinforcing a shift to digital servicing and a more efficient operating model.

Retail financial transactions through self-service channels

98%

Resilience through cloud modernisation

A key enabler of the AI strategy is the Bank's migration to cloud infrastructure, with more than half of the digital transaction volumes now hosted on secure cloud platforms. This shift has strengthened system resilience and scalability, ensuring consistent performance even during peak demand, while enabling hyper-personalisation and real-time analytics across customer journeys. The Bank's cloud platform automatically adjusts computing capacity to meet demand during periods of high activity, such as month-end processing. This flexibility has reduced infrastructure costs and improved system availability as digital volumes grow.

To complement these initiatives, the Bank implemented a comprehensive cloud-security upgrade, introducing enhanced encryption, access controls and monitoring to ensure full compliance with internal and regulatory standards. The annual disaster-recovery exercise was completed successfully, validating ADCB's ability to operate critical banking systems and applications from a backup site for an extended period of time with zero customer impact, demonstrating resilience at scale.

Service requests processed digitally

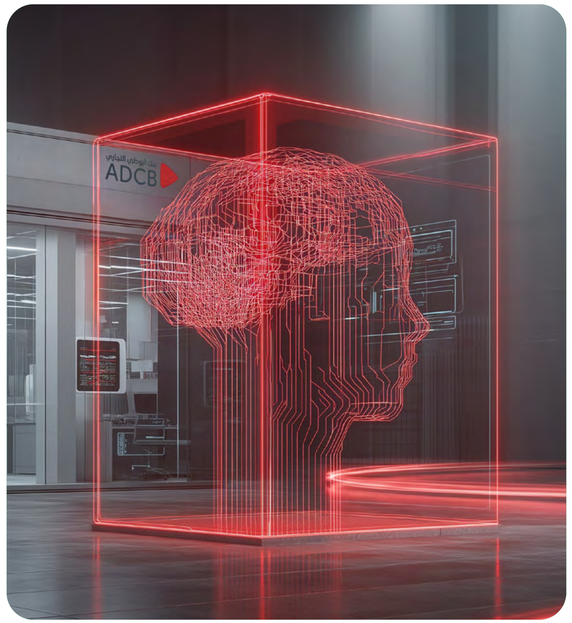
71%

Seamless onboarding and automation to drive productivity

Automation is central to ADCB's digital transformation agenda, delivering enhanced service reliability, customer satisfaction and significant productivity gains. The creation of a unified digital onboarding framework in 2025 was a major development, providing solid foundations for consistent, paperless account opening across customer segments.

For retail customers, the Bank rolled out instant account opening via the mobile app, providing access to conventional and Islamic banking services, as well as new multi-CASA and multi-currency options. The redesigned minor account journey now enables parents to open and manage children's accounts digitally in under two minutes, reducing branch visits and processing time. For SMEs, onboarding and post-onboarding features were added to the web platform, fully aligned with the mobile app and integrated with major UAE trade-licensing authorities, ensuring faster, compliant access to banking services across all emirates.

Leveraging the agility of modular components from next generation platforms, ADCB launched a first-to-market fully digital, paperless onboarding process for Private Banking and Excellency customers, introducing facial biometric consent, end-to-end status tracking, and integrated document scanning.



Another major step forward was the integration of Digisign, ADCB's secure digital signature solution, into the loan processing system which has accelerated loan disbursals, strengthened fraud controls and improved the customer experience through faster, fully paperless processing.

Additional automation initiatives included a real-time know-your-customer (KYC) alert system across all branches, enabling customer records to be updated instantly during visits, eliminating repeat interactions and ensuring ongoing regulatory compliance. In payments, automated reconciliation for more than 700,000 daily card transactions significantly improved processing speed, reduced manual intervention and enhanced accuracy.

Digitally registered customers

93%

Note: The reported figures in this section are for ADCB UAE only

Key digital updates in 2025

Launch of gateway to digital assets

In 2025, the Bank launched a virtual asset trading platform through ADCB Securities, expanding the digital investment offering. The platform enables clients to trade more than 40 digital assets securely within a regulated environment that integrates custody and exchange services. Cloud-based and fully compliant, it provides real-time portfolio tracking and automated e-statements, forming a foundation for future innovation in digital custody and tokenised securities.

Strengthened capabilities for corporate clients

The Bank continued to strengthen its digital capabilities for corporate clients. Enhancements in 2025 included the introduction of term deposit bookings on mobile via the ProCash cash management app, as well as improvements to ADCB's liquidity management and virtual account offering, such as automated and streamlined fee processes, including recovery and charges.

New TouchPoints mobile app

ADCB launched a standalone TouchPoints mobile app, a dedicated platform to manage and redeem loyalty rewards. The app has gained strong early traction and offers features such as bill payments, donations and peer-to-peer point transfers, supporting the continued growth of TouchPoints as a core component of customer engagement.

Auto-enrolment to Aani instant payments

In line with UAE Central Bank directives, ADCB initiated the auto-enrolment of retail customers to Aani, the national instant payments platform. The rollout allows transfers of up to AED 50,000 using identifiers such as mobile number or Emirates ID and supports QR-based payments for 23,000 merchants. The initiative promotes cashless transactions, reduces processing costs and strengthens ADCB's position in the UAE's digital payments ecosystem.

Digital identity integration

In 2025, ADCB began integrating UAE PASS, the national digital identity system, into its retail and SME platforms. This allows customers to verify their identity and sign documents digitally, reducing manual verification and improving security across digital channels.

Safer online payments

ADCB strengthened e-commerce security by enabling customers to approve payments directly within the mobile app via SecurePass using biometrics or a secure PIN, thereby eliminating reliance on SMS one-time passwords, significantly reducing exposure to phishing and other fraud risks.



SPOTLIGHT

Open Finance and ecosystem innovation

ADCB is playing a leading role in the rollout of the UAE's Open Finance Framework, which enables secure data sharing between financial institutions and trusted partners through application programming interfaces (APIs). The framework marks an important step towards open banking in the UAE, creating a connected financial ecosystem that allows customers to access a broader range of lifestyle, investment and financial services through integrated digital platforms. Reflecting its leadership in this area, ADCB became the first bank certified by the Central Bank of the UAE to participate in Al Tareq, the national Open Finance platform operated by Nebras, and successfully completed the first end-to-end payment transaction on the system. ADCB also hosted a joint hackathon with Nebras and other partners, using AI tools to write code and promote open finance innovation.

These initiatives built on ADCB's track record of building ecosystem partnerships with fintechs, e-commerce platforms and technology providers to deliver embedded financial solutions across customer segments. ADCB's modern app and API architecture powers integrations with partners, such as Talabat for payments, and e& for blockchain validation of trade documents. Through such partnerships, ADCB continues to extend its reach and deliver seamless digital experiences across customer lifestyles and supply chains.

Community investments

Why it matters

Supporting local causes and groups helps to improve people's lives and enhances the communities in which they live and work. Community investment through financial support and expertise, charitable work, and volunteering helps promote financial inclusion and education while helping society flourish.

ADCB's approach and progress

ADCB has a long track record of partnerships with charitable organisations and communities in the UAE, supporting meaningful causes.

The Bank is committed to delivering targeted activities, initiatives, and sponsorships that progress socio-economic development within the communities in which we operate.

In-Country Value (ICV) score for ADCB UAE

68.9%

UAE 'Year of Community'



Aligned with the UAE's designation of 2025 as the 'Year of Community', ADCB reinforced its long-standing commitment to inclusive social development by deepening partnerships that deliver measurable, community-level impact. Our total social contributions in 2025 amounted to c.AED 17 million which included sponsorships and donations. The Bank also encourages employees to volunteer in initiatives that deliver tangible societal benefits.

In-Country Value (ICV) generation

ADCB's contribution to value creation in the UAE has been certified as part of the National In-Country Value (ICV) Program by the Ministry of Industry and Advanced Technology. The National ICV Program seeks to boost economic performance and support local industries by redirecting higher portions of public spending into the national economy.

As part of its ICV certification, the Bank was assessed on its contribution through the total amounts spent within the country on:

- Local products and services
- Investments (including tangible fixed assets and investment property)
- Hiring and development of Emiratis
- Contribution to the local economy through the expatriate workforce

The National ICV Program is focused on improving the sustainability of the industrial sector by increasing the contribution of local industries and supporting local companies in advancing economic and social development, as well as contributing to the growth of the country's GDP.

Please click here for **The National In-Country Value Program (ICV)**

Employee volunteering

ADCB partnered with Emirates Red Crescent (ERC) to launch a structured volunteering programme enabling employees to participate in charitable activities during Ramadan, reflecting the Bank's commitment to social responsibility and community engagement. The initiative emphasised skills development, networking, and personal fulfilment while aligning with ADCB's core values of integrity, care, and respect.

The collaboration supported ERC's Ramadan campaign, 'Ramadan Continuous Giving', which provided Iftar meals, Zakat Al-Fitr, Eid clothing, food parcels, and humanitarian support to families in need. ADCB's involvement complemented these efforts by mobilising volunteers and supporting the distribution of essentials during the holy month. ERC's Ramadan programmes ultimately benefited 5.6 million people globally, including over 1 million people in the UAE.



ADCB's strategic partnership with the Authority of Social Contribution - Ma'an

As part of the UAE's 'Year of Community' in 2025, ADCB strengthened its partnership with Abu Dhabi's Authority of Social Contribution, or 'Ma'an', which mobilises resources and delivers programmes to address priority social needs and enhance community wellbeing. The Bank is collaborating on priority initiatives that support volunteering, social entrepreneurship and broader community development.

In 2025, an amount of AED 37 million was paid to Abu Dhabi's Authority of Social Contribution - Ma'an, from ADCB Islamic Banking from late payment fees and penalties recovered from defaulted Islamic financing customers, in accordance with Shari'ah principles and approved internal policies. Such charges are not recognised as income of the Bank, and are instead transferred to a separate charity account, as mandated under Islamic finance rules, with the objective of mitigating credit risk while ensuring Shari'ah compliance of the Islamic financing assets.

ADCB has contributed into 6 transformative Ma'an projects and towards 12 selected partners across Abu Dhabi, driving meaningful change in social, health & education and uplifting over 2,110 beneficiaries from diverse communities in meaningful ways.

Under this partnership, Ma'an evaluates, manages, and allocates ADCB's financial contribution towards projects aimed at achieving tangible socio-economic outcomes. ADCB's partnership with Ma'an demonstrates a comprehensive approach to creating measurable positive impact across Abu Dhabi's communities. The partnership supports several impactful initiatives.

Social sector

Athar+
Abu Dhabi's first purpose-driven hub for accelerating the growth of social enterprises, non-profit organisations, and impact makers, with 28 non-profit organisations selected for its first upskilling programme. ADCB was recognised with the Athar+ Social Impact Award for its sustained commitment to creating positive societal outcomes. ADCB's contribution supports the development of social enterprises, enabling skills development, job creation, and measurable community impact across Abu Dhabi

Education sector

Healthy living programmes in schools
A three-year pilot programme in 15 schools that provides daily healthy meals, nutrition-related education, and fitness tracking to promote wellbeing among schoolchildren and reduce lifestyle-related diseases

Health sector

Cancer charity line
Operating under the Department of Health's regulatory authority and supported by pharmaceutical partners, it provides access to healthcare services by cancer patients who are not covered by health insurance. It aims to benefit up to 700 patients yearly

Re-routed contributions

Selected partners
As part of this collaboration, Ma'an also directs ADCB's contribution to selected partners, including:

- Emirates Red Crescent
- General Authority of Islamic Affairs and Endowments
- Early Childhood Authority
- Family Care Authority
- Make a Wish Foundation
- Zayed Charitable & Humanitarian Foundation
- The Mohamed Bin Zayed Foundation for Humanity



Other community engagement activities

Make it in the Emirates

ADCB was an enablement partner in the Make it in the Emirates exhibition, held in May 2025, at the Abu Dhabi National Exhibition Centre (ADNEC).

The event, organised by the Ministry of Industry and Advanced Technology, showcased the UAE's industrial capabilities and investment opportunities. ADCB's presence highlighted its commitment to supporting national industrial growth by facilitating access to financial solutions, fostering innovation, and engaging with stakeholders across key sectors. Through this partnership, ADCB reinforced its role in driving sustainable economic development and empowering local manufacturing initiatives.

ADCB Pink Run

The ADCB Pink Run 2025, held in October at Zayed Sports City Stadium, Abu Dhabi, marked the 14th edition of this annual event in support of Breast Cancer Awareness.

Organised by ADCB in collaboration with Gulf Multi Sport and Cleveland Clinic Abu Dhabi, the run brought together thousands of participants from across the UAE to celebrate strength, solidarity, and hope. Runners and walkers of all ages took part in 3km, 5km, and 10km races, with proceeds benefiting the Al Jalila Foundation, which supports breast cancer research and patient care.

Sheikh Zayed Festival

ADCB participated in Sheikh Zayed Festival as part of its community engagement efforts, contributing to cultural and community initiatives.

Employees

70 Employee engagement and wellbeing
73 Emiratisation
75 Learning and development
77 Equality, diversity and inclusion



Employee engagement and wellbeing

Why it matters

Employees personify ADCB's values and represent the Bank to customers, clients and other stakeholders. The well-being and engagement of employees are vital to the ongoing success of the Bank's business.

ADCB's approach and progress

ADCB's strategic focus on its people remains paramount. By empowering employees to reach their full potential, the Bank is developing a high-performance culture to drive the organisation's ambition. The execution of the Bank's five-year strategy is underpinned by its core values of integrity, respect, care, discipline and ambition.

ADCB is committed to nurturing employees' well-being and professional development. Listening to employees' feedback is central to this approach. By understanding areas of strength and opportunities for improvement, the Bank is better positioned to anticipate and respond to employees' needs and foster a workplace where all employees can thrive.

Please click here for ADCB's **Employee Code of Conduct**

ADCB's approach to employment and labour practices adheres to local labour laws in the locations we operate in. At the same time, the Bank nurtures a people-focused culture and working environment.

The Bank maintains ethical labour practices through established HR governance framework, which includes policies on compensation, working hours, recruitment, equal opportunity, and workplace safety. Among other things, these policies emphasise:

- **Fair and equitable compensation:** aligned with market benchmarks and internal pay structures, as outlined in the rewards and benefits policy
- **Safe and respectful working conditions:** supported by a working hours policy and guidelines on work-related health. This is reinforced through regular safety communications and wellbeing initiatives
- **Protection of worker rights:** with zero tolerance for discrimination, forced labour, and unethical employment practices, as defined in the recruitment policy and Code of Conduct

> To support these commitments, ADCB has developed a comprehensive HR employee handbook along with an employee portal.

This centralised resource provides employees with consistent guidance on employment policies, benefits, and professional development opportunities, reinforcing the Bank's core values and promoting transparency and empowering employee experience across the organisation.



SPOTLIGHT

Publication of Human Rights Position Statement in 2025

ADCB is firmly committed to protecting the human rights of employees, suppliers and customers. The Bank respects and supports international principles aimed at protecting and promoting human rights, as enshrined in the United Nations Universal Declaration on Human Rights.

In 2025, ADCB published a new Human Rights Position Statement reinforcing its approach to recognising and upholding human rights across its operations, supply chain and financing activities. The statement highlights ADCB's commitments to eliminate practices such as discrimination, human trafficking, modern slavery and other unethical labour practices.

Please click here for ADCB's **Human Rights Position Statement**

ADCB complies with the UAE's labour law and international human rights standards. The Bank actively promotes human rights, including protecting the rights of its employees to be free from discrimination based on race, nationality, colour, ethnic origin, gender, disability, or religion. The Code of Conduct promotes equality and justice and seeks to provide just, favourable, and safe working conditions. It has zero tolerance for harassment and bullying, the exploitation of children, and human trafficking.

ADCB also promotes human rights through its Vendor Code of Conduct that applies to all suppliers and is formally communicated to them upon engagement, while the ESRM Policy aims to monitor and safeguard human rights in our lending and investment activities.

ADCB's approach to recruitment

ADCB promotes equal opportunities for all. The Bank recruits without any preferences related to a candidate's nationality, ethnic origin, marital status or gender, subject to any specific requirements set out in UAE law. All ADCB employees, regardless of their country of origin or citizenship, are governed by the laws, regulations and decrees of the UAE and other applicable geographies, in addition to the Bank's internal policies and their individual employment contracts.

New hires in 2025

Total new hires

989

By gender



By age

- Under 25 years - 164
- 25-34 years - 431
- 35-45 years - 323
- Over 45 years - 71



Employee experience

At the centre of our approach is our employee engagement strategy. All employees are invited to participate in two workplace surveys, which provide insights to help the Bank sustain and evolve its culture and employee experience:

- Organisational Health Index (OHI) survey (conducted annually)
- Line Manager Index (LMI) survey (conducted semiannually)

Organisational Health Index (OHI)

ADCB's approach to fostering a positive, productive workplace culture with strong employee engagement was demonstrated in the results of the latest Organisational Health Index (OHI) survey, conducted by a leading global consultancy firm.

The OHI survey, an internationally recognised benchmark, measures organisational health based on specific health outcomes, management practices, and employee experience. The survey evaluates various components of employee experience across the Group, including:

- Innovation and learning
- Employee motivation
- Work environment
- Organisational capabilities
- Inclusion and belonging New in 2025
- Wellbeing and a sense of purpose

In the 2025 OHI survey results, ADCB performed strongly across key dimensions, including direction and leadership, accountability, a customer-centric mindset, innovation and learning. Employee participation in the survey reached 95%, indicating a strong sense of engagement. Collectively, the results point to a healthy organisational culture, and the continued effectiveness of the Bank's management and leadership approach in supporting long-term performance.

The Bank achieved a high OHI rating, firmly positioning ADCB in the top quartile of companies globally, well above the median for global industry peers and among the top three banks in the Middle East.

The Bank ensures the OHI serves not only as a measure of organisational health, but as a catalyst for continuous improvement. To embed employee feedback into the organisation, the Bank conducts regular town halls, and events on topics of importance to employees, building stronger connections between leadership and staff.

Employee recognition - Tamayuz Awards

ADCB's Tamayuz Awards honour individuals and teams who embody its values of integrity, respect, care, discipline and ambition. The awards recognise those who exceed expectations, making a positive impact on customers, colleagues, and the business. In 2025, the Bank recognised the contributions of over 3,000 colleagues.

2025 Organisational Health Index (OHI) survey[1]

Employee participation rate

95%

Global ranking in OHI

Top quartile



SPOTLIGHT

Line Manager Index (LMI)

To support further two-way engagement and feedback, employees also participate twice a year in the Line Manager Index (LMI) survey, which measures management effectiveness against defined performance indicators, with results shared with individual line managers and Executive Management to support targeted feedback and development.

Drawing on the results of the LMI survey, the Bank launched a suite of AI learning pathways in 2025 aimed at enhancing the skills and capabilities of employees across differing roles. The Bank also launched a programme to support new line managers in their first year by sharing key business resources, building networks with other new managers, and immersing them in the organisation's business and culture.

(1) ADCB UAE only

Grievances

ADCB fosters an environment where employees at all levels are empowered to confront improper behaviour and raise grievances. This has been achieved through the implementation of various policies, including the Code of Conduct, the Employee Grievance Policy and the Whistleblowing Policy.

The Bank has a formal grievance process for employees to raise complaints to management. Prompt and fair consideration is given to each grievance. Employees are not subject to retaliation for initiating the process or for participating as witnesses.

If employees have any concerns, they are encouraged to raise them directly with their managers or through the Bank's formal grievance platform. Employees are also able to submit grievances via a dedicated email address.

In 2025, the Bank conducted multiple town hall events throughout the year, enabling employees to gain a clearer understanding of company policies, grievance procedures and available support mechanisms. These sessions have empowered employees to address concerns proactively and seek clarification on workplace matters before escalating them into formal grievances. Additionally, they helped foster a culture of transparency, open communication, and trust in the Bank.

Employee grievances filed in 2025 were addressed or resolved

100%

Health, safety, and wellbeing

ADCB encourages a positive work-life balance among its employees and takes a responsible approach to the welfare of its staff. This includes the provision of medical insurance that covers treatment for a wide range of illnesses, free annual medical checks, and support for mental health.

The Bank's health and safety team ensures compliance with all relevant regulatory and internal policies and procedures. Our approach has received external recognition with UAE Civil Defence safety certificates awarded for all ADCB branches, offices and other premises.

Each office has an emergency response team, which includes a health and safety warden. Periodic drills are carried out to test the effectiveness of emergency response procedures. The Bank also carries out regular risk assessments and provides first aid and fire warden training for nominated employees. All health and safety incidents are reported and investigated, with relevant learnings used to inform any revisions to the Bank's policies and procedures.

Work related injuries reported for employees in ADCB UAE

Zero

Enhancing productivity through flexibility

Flexible working models were continued in 2025, supporting employees to balance professional and personal commitments while maintaining collaboration and productivity. The Bank has maintained a four-and-a-half day working week, with the option to work remotely on Fridays. Additionally, employees may take up to 10 days per year of remote work, either from home or abroad. Employees can also apply for extended remote work arrangements of up to one year, providing greater flexibility when dealing with specific personal and family circumstances.

> With over 80 nationalities represented among ADCB's employee base, the Bank promotes a high-performance culture where all individuals feel valued and empowered to achieve their true potential



Emiratisation

Why it matters

ADCB is committed to making a significant contribution to the UAE's progressive Emiratisation agenda to ensure long-term sustainable growth of the country's financial services sector. By investing in Emiratisation, the Bank attracts high-calibre Emirati talent into the workforce and enhances its In-Country value (ICV).

ADCB's approach and progress

Emiratisation remains integral to the continued development of a resilient and competitive banking sector in the UAE. As the industry forges rapid technological change in an increasingly complex regulatory environment, development of Emirati leadership is key to the strengthening of institutions in alignment with the nation's economic vision.

Across the organisation, ADCB continues to strengthen its Emirati talent base, with around 238 UAE nationals joining the Bank in 2025.

> The Bank recruited 238 UAE nationals during the year, bringing total Emirati headcount to 2,054 representing around 40% of the workforce, one of the highest ratios in the UAE banking sector.

Further information on **ADCB's contribution to ICV** can be found on page 67 of this report

A strong pipeline of future leaders is reflected in the high proportion of Emiratis under 30 and steady progression across roles. In 2025, 698 UAE national employees were promoted, underpinned by structured development and succession planning.

ADCB recognises this strategic importance and continues to invest in national talent to lead the organisation. Emirati professionals play a defining role in the Bank's most senior decision-making forums, contributing directly to strategy, governance and oversight. Within executive and other key governance bodies, UAE national talent holds significant influence; 40% of voting roles within the Management Executive Committee, 60% on the Compliance Committee, and 71% on the Risk Management Committee.

In 2025, the Bank strengthened its leadership pipeline by promoting UAE nationals into key senior roles, while complementing this with external appointments of Emirati talent to positions such as Acting Group Chief Risk Officer, Deputy Treasurer and Chief Information Security Officer.

Percentage of Emiratis on key ADCB committees	
Management Executive Committee	**40%**
Management Credit Committee	**50%**
Risk Management Committee	**71%**
Management Compliance Committee	**60%**
Assets & Liabilities Committee	**43%**

Training programmes for UAE nationals

ADCB places strong emphasis on capability building through its 'Emirati Training Academy', which is central to developing a skilled and future-ready Emirati workforce. This ensures that Emirati employees are well positioned to lead, adapt and innovate as the UAE banking landscape continues to evolve.

During the year, participants completed more than 140,000 learning hours, representing an average of 68 hours per learner. The effectiveness of the programme is further reflected in an Emirati training net promoter score exceeding 95, highlighting the Academy's role in supporting the long-term strategic objectives of the Bank and the sustained development of national talent.

ADCB remains steadfast in its commitment to nurturing Emirati talent through structured learning and development programmes designed to enhance both professional and personal competencies.

Under the Emirati learning programmes, participants focus on core capabilities such as technical and leadership skills. Complementing this, the ETHRAA Programme, delivered in collaboration with the Emirates Institute of Finance (EIF), aims to strengthen the skills of Emirati staff within the financial sector by channelling their potential into targeted learning pathways. Strategic partnerships with leading institutions further reinforce this commitment. Key initiatives include:

- Future Tech Leaders Program, offering AI and data science specialisation for early career professionals
- Emirati Empowerment Programme, developed with RIT University to advance technical and leadership skills
- Strategic Leadership in the Era of Disruption programme, in collaboration with Saïd Business School, University of Oxford, equips senior leaders with the tools and strategic clarity required to lead transformation in a dynamic global environment

Emiratisation in numbers[1]



c.40%
Emirati representation in employee base

698
Emirati employees promoted in 2025

c.80%
Female representation among Emirati employee base

40%
Emirati representation within the senior management team

238
Emiratis recruited in 2025

140,000+
Training hours for Emiratis; average 68 hours per employee

(1) Emiratisation figures refer to UAE nationals employed by ADCB UAE and AHB UAE



SPOTLIGHT

A major milestone for Emiratisation in Al Ain

In early 2025, ADCB achieved 100% Emiratisation of banking roles across its Al Ain operations, the first milestone of its kind in the UAE banking sector. The Al Ain Operations Centre has become a model for how investment in national talent can deliver both operational excellence and meaningful employment.

More than 390 UAE nationals now serve in roles spanning Islamic banking, corporate banking, cash management, operations and wealth management. With an average tenure of nine years, the Al Ain team combines technical expertise with deep understanding of customer needs and the Bank's service standards.

Building on this success, ADCB plans to create a further 220 roles for UAE nationals in Al Ain by the end of 2026, bringing the total to more than 600, reinforcing its contribution to sustainable regional employment and UAE Vision 2031. Fully managed by experienced Emirati professionals, the Al Ain Operations Centre has evolved into a hub of excellence for banking operations and service delivery.

The experience gained in Al Ain continues to inform the Bank's wider Emiratisation strategy, which includes expanding similar initiatives across other Emirates, particularly in digital services, operations and client support. This approach blends both strategic localisation and strengthening the skills base to enhance performance.

Through ADCB's close collaboration with government entities and national partners, it has significantly enhanced its recruitment strategy, enabling the Bank to attract top Emirati talent. These partnerships have been instrumental in providing structured development pathways that ensure long-term career growth for Emirati colleagues.

Looking to the future, ADCB remains steadfast in advancing its Emiratisation strategy. The Bank plans to introduce specialised training programmes, leadership development initiatives, and new career pathways across digital, operations, and modern banking services. These efforts align with the UAE's national vision to build a high-performing Emirati workforce.

Emiratisation in Al Ain operations

100%

Emirati employees across Al Ain operations

390+



SPOTLIGHT

Nafis Award 2025 'Diamond Category' for Exceptional Efforts in Emiratisation

ADCB's leadership in Emiratisation was recognised at the 2025 Nafis Awards, where the Bank received the 'Exceptional Efforts – Diamond Category' honour, presented by H.H. Sheikh Mansour Bin Zayed Al Nahyan, UAE Vice President, Deputy Prime Minister, Chairman of the Presidential Court and Chairman of the Emirati Talent Competitiveness Council.

Nafis, a nationwide programme to advance Emirati participation in the private sector, provides an important platform for collaboration between government and industry.

The award recognises ADCB's strong performance in Emirati hiring, development, career progression and female participation, as well as its continued success in exceeding Emiratisation targets across leadership levels. Enhancements introduced during the year to streamline hiring processes have significantly improved the candidate experience, supporting the attraction and retention of Emirati talent.

Learning and development

Why it matters

Providing a wide range of learning and career development opportunities enables ADCB to ensure its people are equipped with the personal and professional skills they need to achieve their career aspirations, while also making a valuable contribution to the Bank's growth. This not only helps to attract and engage employees, but also enhances ADCB's reputation as an employer of choice and provides a competitive advantage in the market.

ADCB's approach and progress

The Bank continues to invest significantly in professional training to support employees in their performance and career progression. Learning is generally delivered via a blended approach of in-person and online modules covering a variety of technical trainings, certifications and behavioural topics in partnership with leading international providers.

To promote continuous development, ADCB provides a diverse curriculum of learning opportunities tailored to different roles and levels within the workforce. Each employee's strengths and development needs are identified and aligned with an individual development plan to support their professional goals.

Average training hours per employee in 2025

48

Employee training

ADCB promotes continuous development to equip employees with the skills and confidence to meet evolving business and technological demands. In 2025, the Bank prioritised targeted programmes to strengthen digital fluency, the practical application of Artificial intelligence (AI), leadership capabilities and career progression.

Driven by Ambition University, an in-house centre for strategically aligned learning, employees benefit from access to an integrated suite of digital learning platforms, providing tailored journeys and self-paced modules. These are complemented by live workshops and collaborative exercises, which embed continuous learning into everyday work.

The ADCB Leadership Academy, delivered in partnership with globally recognised institutions, develops current and future leaders with the mindset and capabilities to navigate complexity and drive high performance. Modules cover strategic thinking, innovation, resilience and inclusive leadership.

In 2025, the number of learning hours completed at ADCB Group was over 400,000, equivalent to an average of 48 per employee. This commitment continues to enhance internal mobility and cultivates a high-performing, future-ready workforce to sustain ADCB's growth and innovation.

AI Academy

To strengthen expertise in emerging technologies, ADCB's new AI Academy provides a structured three-tier pathway: AI for Everyone, AI for Practitioners and AI for Leaders; supporting employees at all levels. During the year, all employees had the opportunity to access learning to help them leverage AI tools responsibly to enhance service delivery, strengthen efficiency and accelerate innovation. The academy offers more than 40 programmes combining role-based courses, hands-on labs and use case clinics, enabling employees to apply AI in real world scenarios and co-develop ADCB-specific solutions with experts.



SPOTLIGHT

Building ESG awareness and capabilities

Regular training and development are recognised as an essential element in the successful execution of the Bank's ESG strategy. Through ADCB's ESG training plan, the Bank seeks to embed sustainability principles into its organisational DNA. ADCB's ESG training framework consists of three distinct phases of learning:

- **Foundational:** Introductory training to raise awareness of ESG
- **Role-specific:** Tailored training aimed at building sustainability skills as it relates to different roles
- **Advanced:** Specialist certificates or diploma courses with reputed universities or academies

In 2025, courses such as 'Introduction to Sustainability', and 'UN Sustainable Development Goals', continued to build foundational awareness across the Bank, while advanced programmes including 'ESG Data and Reporting', and 'Green and Sustainable Finance' helped to deepen understanding in more specialist topics.

In addition, the Bank provides specialist courses with the Emirates Institute of Finance (EIF), Cambridge Institute of Sustainability Leadership (CISL), Corporate Governance Institute and other similar institutes.

During the year, more than 16,000 training hours were completed across multiple ESG learning programmes. The in-house learning programme was significantly expanded with the roll out of an ESG training prospectus across the Bank.

This reflects the Bank's commitment to fostering sustainable practices, empowering employees, and positioning the Bank as a leader in ESG implementation.

Performance management

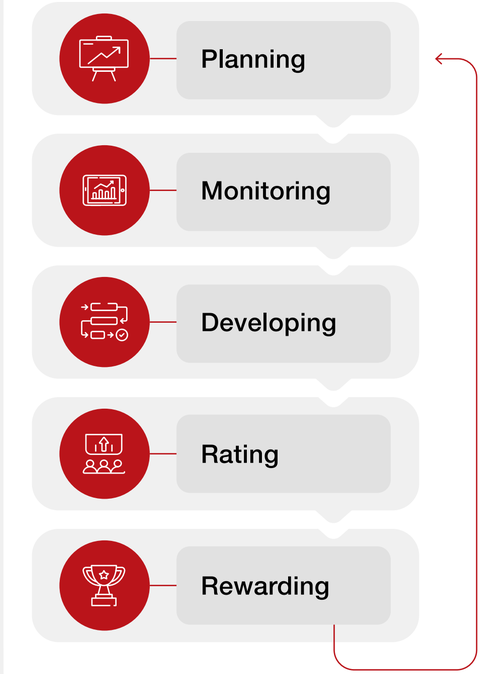
The Bank promotes a high-performance culture at every level. This is supported by a robust performance management framework that includes strategic key performance indicators (KPIs), well-defined targets and success measurements, enabling accountability and continuous growth. This is complemented by a transparent approach delivered via an internal infrastructure that supports employees and accommodates their individual development needs.

In addition to setting KPIs and objectives, at the beginning of the year every employee creates an individual development plan linked to specific performance indicators. This includes an overview of key strengths and development areas from both a behavioural and a technical perspective.

Alongside formal reviews undertaken at the middle and end of the year, the performance framework is also designed to encourage continuous feedback and support for all employees throughout the year. This model is designed to drive alignment between individual performance and team contributions.

To promote continuous improvement and transparency, performance conversation guides have been made easily accessible to managers at all levels. In line with our commitment to innovation, the Bank will continue introducing advanced AI tools to enhance the employee experience and strengthen performance management practices.

Performance management process



For information on **OHI**, please refer to page 71 of this report

Succession planning at ADCB Group

ADCB continued to develop its succession planning strategy in 2025 by focusing on two main principles:

- Ensuring business continuity
- Empowering growth

The Bank mitigates people-related risks through a structured succession management framework that identifies critical roles, assesses leadership competencies, and maintains strong internal talent pipelines to ensure continuity at all levels. Successor readiness is strengthened through targeted development pathways, including leadership academies, coaching, and mentoring programmes.

Key risk indicators, such as the proportion of roles without identified successors and the completion rates of performance reviews, are embedded within the Bank's governance framework and are monitored regularly against defined targets to identify gaps, track progress, and maintain effective oversight.

In 2025, ADCB launched a leadership developmental assessment, based on Korn Ferry Leadership Architect model. This model encompasses four dimensions considering competencies, traits, drivers, and experiences, focusing on critical behaviours relevant as a leader. This initiative enables participants to have a clear picture about their leadership profile, strengths, and areas of growth.



Succession planning for UAE nationals

ADCB continues to build initiatives to ensure the progression of UAE nationals across all areas of the organisation, accelerating their development and further supporting the Bank's Emiratisation objectives. This included identifying talented Emiratis with high leadership potential, boosting the pipeline of future Emirati leaders.

The Bank is committed to investing in Emirati talent, empowering UAE nationals with continuous development to prepare them for future leadership roles.

Equality, diversity and inclusion

Why it matters

ADCB recognises that diversity in the workplace makes us stronger. Equality, diversity and inclusion provide the tools to create a more innovative, resilient business that is better able to respond to challenges, attract the best talent, and provide an enhanced customer experience.

ADCB's approach and progress

With over 80 nationalities represented among ADCB's employee base, the aim is to foster an inclusive culture of mutual respect, where diversity is embraced and all individuals feel valued and empowered to achieve their true potential. The Bank respects the human rights of all employees, ensuring dignity and equality for everyone, regardless of race, religion, gender, age, or language.

The Bank is committed to ensuring that all employees are treated with fairness, equality, and respect. ADCB ensures fair and equitable remuneration and development opportunities for women, in compliance with UAE labour law which mandates equal pay for equal work for men and women.For further details on our approach to human rights please refer to page 70 of this report.

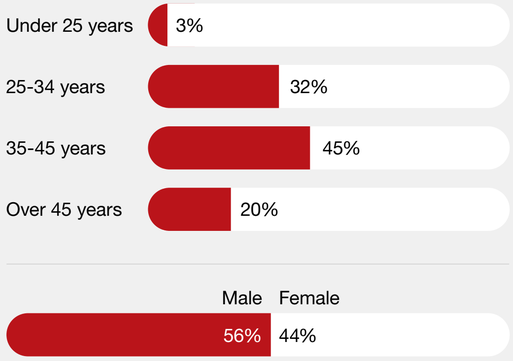
Ratio of median male to median female salary[1]

0.97

Employee gender diversity

ADCB's sustainability strategy is closely aligned with the relevant UN Sustainable Development Goals (SDGs) on gender equality. Among our employees, over 40% are female and over 20% of the Management Executive Committee (MEC), including the Group Chief Compliance Officer, Acting Group Chief Risk Officer, and Group General Counsel, are female. In addition, women comprise over 30% of employees in ADCB Egypt and over 50% in ADCB Kazakhstan. For more information on Board gender diversity, please refer to page 85 of this report.

ADCB Group employee profile by age and gender





SPOTLIGHT

'Tamooha' advancing careers for Emirati women

Established to create flexible career pathways for Emirati women, Tamooha remains one of ADCB's most impactful inclusion programmes and a cornerstone of its Emiratisation journey. Now more than a decade in operation, the initiative has created career opportunities for more than 400 Emirati women, with 178 currently working across a range of business and support functions.

The programme offers flexible, remote and hybrid working models, along with dedicated women-only centres that foster collaboration and professional development. Tamooha enables participants to build meaningful careers in operations, customer service, data management and processing, while balancing family and cultural commitments.

Over the years, many Tamooha graduates have advanced into senior roles, contributing to the Bank's leadership pipeline and broadening expertise across functions. The programme continues to evolve, demonstrating that flexibility and professional growth can coexist, delivering benefits to individuals, organisations and the wider economy.

Job opportunities for Emirati women through 'Tamooha' programme over a decade

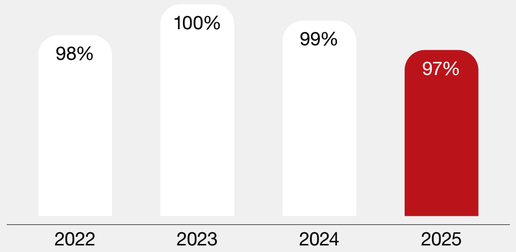
400+

(1) Higher median salary for female staff when compared to median salary for male staff in ADCB UAE operations

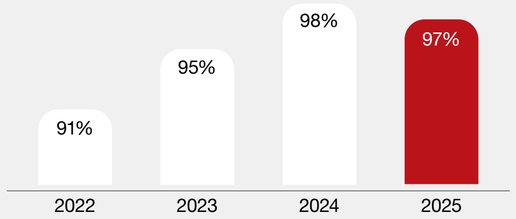
Parental leave

ADCB supports its employees with adequate parental leave in line with the local regulatory requirements in each of the countries in which it operates.

Return to work rate[1]



Retention rate[2]



(1) Female employees who returned to work from maternity leave
(2) Female employees who returned from parental leave and were still employed 12 months after returning to work
(3) Employees who have not completed one year of service are entitled to this leave with half-pay

Parental leave policy by country

United Arab Emirates

(ADCB UAE and all subsidiaries in the UAE)

Maternity leave

- 90 calendar days with full pay (which exceeds the 60-day requirement of UAE labour laws)[3]
- Maternity leave can start 10 days before the delivery date and is available for all employees, regardless of length of service
- Employees can choose to take any accrued annual leave in conjunction with maternity leave, with the total consecutive period of absence not exceeding four months
- Maternity leave for outsourced employees: 45 calendar days with full pay, and 15 calendar days with half-pay
- Nursing mothers are entitled to take a break of one hour each day during working hours, for 18 months after delivery

Paternity leave

- Three calendar days with full pay

Parental leave

The Bank also offers leave of five working days for a mother or father to take care of their child. This leave can be taken continuously or intermittently within a period of six months from the date of birth of the child.

Egypt

(ADCB Egypt)

Maternity leave

- 90 calendar days of fully paid leave and up to two years of unpaid leave (allowed only twice)

Paternity leave

- Men have no provision for paternity leave in local labour laws

Kazakhstan

(ADCB Kazakhstan)

Maternity leave

- Paid leave (through eligible government social allowances) of up to 126 calendar days
- This type of leave can be combined with accrued annual leave

Paternity leave

- Five business days with full pay

Governance

80 Corporate governance, compliance and code of conduct

92 Risk management and cybersecurity

99 Financial crime, anti-bribery and corruption

102 Tax transparency



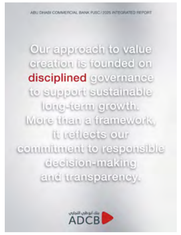
Corporate governance, compliance, and code of conduct

Why it matters

ADCB regards robust corporate governance as fundamental to sustaining long-term financial performance and operational resilience. It reinforces the Group's standing as a trusted institution in the financial sector and enables effective value creation for all stakeholders. Strong corporate governance enhances decision-making, improves risk management, and ensures regulatory compliance, ultimately driving financial performance while building trust with investors, and other stakeholders.

Monetary losses as a result of legal proceedings associated with non-ethical business practices[1]

Zero



Further information on corporate governance can be found in our **2025 Integrated Report**

ADCB's approach and progress

ADCB's approach to corporate governance is rooted in its core values of integrity, care, ambition, respect and discipline, ensuring compliance with regulatory requirements and global best practices. These values are key to ensuring the Group's financial stability, business integrity, continued growth and contribution to the UAE's sustainable economic development. ADCB maintains a strong Group Corporate Governance Framework that complies with the requirements of the Central Bank of the United Arab Emirates (CBUAE), the Capital Market Authority[2] (CMA) and the Abu Dhabi Securities Exchange (ADX), proactively responding to an evolving regulatory landscape.

The Bank's governance structure is built around a strong and experienced Board, supported by specialised Board Committees. These include the Board Executive Committee, Board Risk Committee, Board Audit Committee and Board Nomination, Compensation, HR & Governance Committee. Through this delegation of authority and responsibility, the Group ensures the decision-making process is streamlined and operational efficiencies are optimised.



(1) Reported as total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations for ADCB Group
(2) Effective 1 January 2026, the Securities and Commodities Authority (SCA) was renamed as the Capital Market Authority (CMA)

The Group's Corporate Governance Framework and the guiding principles

ADCB's corporate governance framework is built on four guiding principles: fairness, accountability, responsibility, and transparency of disclosures. These principles define how the Board, its Committees and Executive Management oversee strategy, risk management, and stakeholder relationships across the Group.

The governance structure defines clear roles, responsibilities, and delegated authorities. The Board, composed of experienced professionals, maintains a disciplined and systematic approach to governance through regular reviews of the governance framework to reflect regulatory developments, business priorities and market dynamics. Executive Management implements strategy, upholds operational excellence and promotes a high-performance culture across the organisation.

Governance practices form a key enabler of ADCB's ambitions embodied in the five-year strategy launched in January 2025. The framework ensures prudent oversight of risk, compliance and sustainability, strengthening the Bank's adaptability in a changing environment.

With ADCB announcing a comprehensive artificial intelligence (AI) transformation programme in October 2025, the Bank is adopting a robust governance structure for innovation and deployment of AI, which guides the responsible use of advanced technologies while maintaining transparency and stakeholder confidence.

Please click here for **ADCB Corporate Governance policies**

The Group's Corporate Governance Framework and the guiding principles



Responsibility
promoted by the clear distribution and delegation of authority

Accountability
in the relationships between the Bank's Executive Management and the Board; between the Board and shareholders and other stakeholders

Fairness
in the treatment of all stakeholders

Transparency of disclosures
to enable stakeholders to assess the Group's strategy and financial performance and condition

ADCB creates value for stakeholders by combining strong capabilities, effective governance and disciplined execution

Core capabilities

- Technology and innovation
- People, talent & leadership
- Risk, controls and compliance framework
- Brand strength and customer trust

Governance

- Board oversight
- Strategy execution
- Risk and compliance
- Internal controls
- AI and technology governance

Stakeholders

- **Customers:** service excellence and innovation
- **Employees:** fulfilling careers and professional development
- **Investors:** strong returns and long-term value creation
- **Regulators/Government:** strong and effective governance framework
- **Community:** supporting socio-economic development
- **Partners:** business opportunities and shared growth

Corporate governance compliance: adapting to regulatory amendments

ADCB remains committed to proactively responding to regulatory changes and strengthening its corporate governance framework to drive sustainable growth, uphold its reputation as a pioneering financial institution, and safeguard stakeholder interests.

The Board Audit Committee (BAC) provides oversight and monitors compliance of new regulatory requirements, and implementation of associated action plans, ensuring the corporate governance compliance processes remain comprehensive and efficient.

2025 key corporate governance initiatives

1. **Integration of AI into governance processes**

   ADCB introduced AI-enabled tools, including Board Observer, to enhance board effectiveness by providing secure, real-time access to verified information and supporting informed decision-making

2. **Strengthening governance framework**

   The Bank continued to refine its governance structure in line with regulatory developments, reinforcing clear roles and responsibilities across the three lines of defence and ensuring consistent application of controls

3. **Enhancement of Board oversight and information flow**

   Established dashboards to provide the Board with real-time visibility of compliance metrics and governance performance

Code of conduct

ADCB periodically reviews its Board-approved Conduct Compliance Framework and related policies, including the Employee Code of Conduct. The framework includes the development of methodologies for identifying, assessing, reporting, and mitigating conduct risks. The Bank takes a zero-tolerance approach to behaviour that breaches the following:

- Code of Conduct
- Conflict of Interest Policy
- Anti-bribery and Corruption Policy
- Insider Trading Policy
- Personal Account Dealing Policy
- Outside Business Interests Policy

The Code of Conduct applies to all ADCB employees and its subsidiaries. It outlines the standards of ethics and professional behaviour expected of employees and representatives when dealing with customers, colleagues, shareholders, communities, and each other. It also provides an overview of key legal and regulatory requirements and policies.

Employees must confirm they have read and understood the Code of Conduct when they commence their employment. Any violations may result in disciplinary action, including termination of employment. All employees are required to reconfirm their acceptance of the Code of Conduct every year.

The Bank also has a Directors' Code of Conduct that covers the relevant policies and procedures Directors must abide by.

Whistleblowing Policy

ADCB encourages its employees, outsourced staff (including contract employees), and third-parties to raise and report, in good faith, any concerns related to misconduct, illegal, unethical, or fraudulent acts. The Bank's Whistleblowing Policy is overseen by the Group Internal Audit Department, which appoints a dedicated officer responsible for receiving and examining all reports.

Whistleblowers may submit concerns confidentially or anonymously through a designated email address, or the ADCB website with all channels managed by Internal Audit. All details of reports received are kept strictly confidential, and the identity of whistleblowers is protected to the fullest extent permitted by law.

ADCB enforces a zero-tolerance policy for any form of retaliation against whistleblowers. All new employees receive mandatory training on the whistleblowing process, and ongoing awareness is maintained through regular Code of Conduct training for all staff.

The Bank maintains a structured whistleblowing process whereby all reports are formally acknowledged, screened for legitimacy, and independently assessed and investigated by Internal Audit in a timely manner, in line with approved policies and supported by relevant functions where necessary. Outcomes are securely maintained and reported to senior management and the Board Audit Committee. The policy and process are regularly reviewed to ensure effectiveness and alignment with best practices and regulatory requirements.

Whistleblowing cases that were substantiated[1]

11%

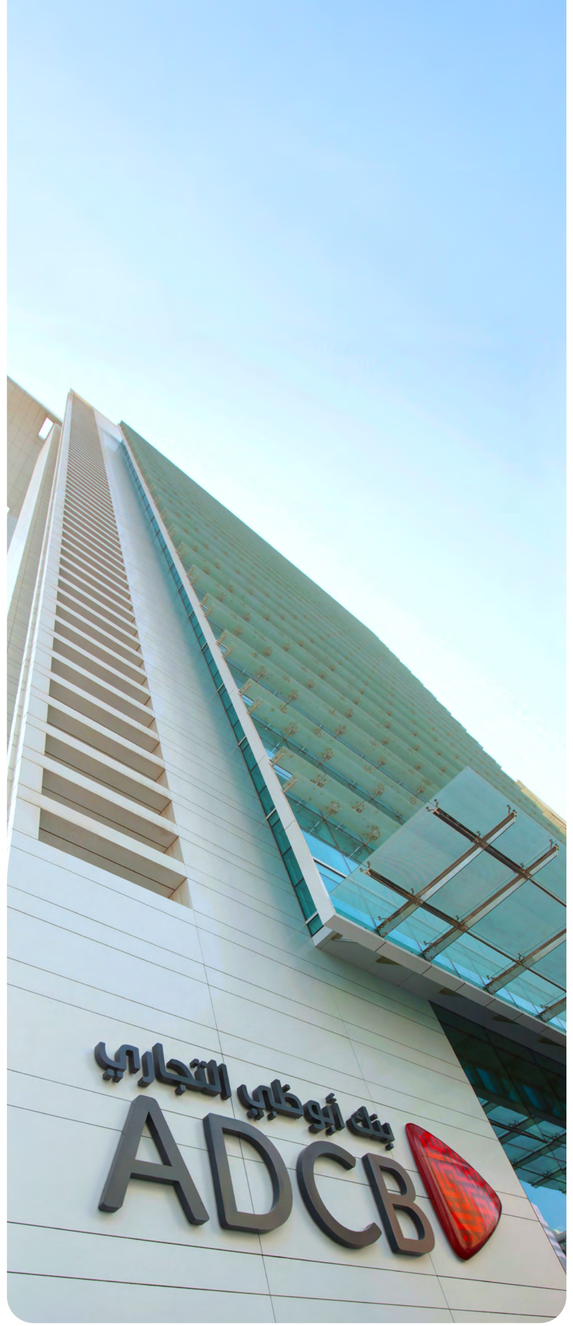
Compliance monitoring and reporting

Group Compliance is an independent function within the Bank that identifies, assesses, advises on, monitors, and reports on the Bank's compliance risks. It monitors the risk of regulatory sanctions the Bank may face as a result of a potential failure to comply with laws, regulations, rules, related internal standards, and codes of conduct applicable to its activities.

ADCB's Group Chief Compliance Officer (GCCO) has a primary functional reporting line to the Group Chief Executive Officer (GCEO) and has direct access to the Board and the Board Audit Committee (BAC) to report on compliance matters.

Group Compliance is tasked with the monitoring and implementation of the compliance framework, as well as managing financial crime risks, executing the compliance plan, coordinating on relevant compliance issues, and assisting the GCCO in executing their duties.

Further information on compliance can be found in our **2025 Annual Report** pages 182–185



(1) Out of 152 cases that were filed and addressed in 2025

Governance structure



All sustainability initiatives are monitored by the Group Sustainability Committee (GSC), which is chaired by the Group Chief Financial Officer. The GSC provides regular updates to the Management Executive Committee (MEC) and to the Core Strategy Steering Group.

A strong governance structure requires rigorous awareness of the regulatory environment, vigilant oversight, and a culture of accountability led from the top. At ADCB, this structure is anchored by a highly experienced Board, supported by Board Committees with clearly defined mandates that provide effective oversight and informed guidance.

The Management Executive Committee (MEC), consisting of the Bank's most senior executives, plays a pivotal role in implementing the Board-approved strategy and objectives. Guided by the Group Chief Executive Officer (GCEO), the MEC ensures that responsibilities are clearly defined across the Bank's diverse management forums and committees, promoting a cohesive and transparent governance structure.

- **The Acting Group Chief Risk Officer** reports directly to the Board Risk Committee (BRC) and reports administratively to the GCEO
- **The Group Chief Internal Auditor** reports directly to the Board Audit Committee (BAC) and reports administratively to the GCEO
- **The Group Chief Compliance Officer** reports directly to the GCEO and has direct access to the BAC and to the Board
- **The Group Company Secretary** reports directly to the Board and administratively to the Group Chief Compliance Officer
- **The Acting Head of Islamic Banking** has a direct reporting line to the Management Executive Committee (MEC) and reports administratively to the Group Chief Retail Banking Officer

Details on the next page

Further information on **Sustainability Governance Framework** can be found on page 16 of this report

Governance structure (continued)

ADCB's governance structure is anchored by a highly experienced Board, supported by Board Committees with clearly defined mandates that provide effective oversight and informed guidance.

Board of Directors

Chaired by: **H.E. Khaldoon Khalifa Al Mubarak**

The Board sets the Group's overall direction and maintains a robust framework of delegated authorities and controls. It defines the Group's purpose, values, and strategic goals, ensuring operational soundness, financial stability and protection of stakeholder interests. The Board also provides oversight and guidance to Executive Management.

Board Executive Committee (BEC)

Chaired by:
Saeed Mohamed Hamad Al Mazrouei

The BEC oversees the development and execution of strategic objectives, including the Group's business initiatives, AI, digital transformation and sustainability agenda. It also reviews and approves material credit commitments, supporting the Bank's long-term growth.

Board Risk Committee (BRC)

Chaired by:
Fatima Al Nuaimi

The BRC oversees the Bank's Risk Management Framework, establishes the Group's risk appetite and strategy, and monitors capital adequacy. It manages key risk areas including credit, liquidity, market, operational, information security and Shari'ah compliance, as well as third-party, data and fraud risks, ensuring robust risk governance across the Group.

Board Nomination, Compensation, HR & Governance Committee (NCHRGC)

Chaired by:
H. E. Hussain J. AlNowais

The NCHRGC oversees remuneration policies, Board appointments, and performance evaluations. It ensures effective succession planning, guides HR strategy with a focus on Emiratisation, and develops the Group Corporate Governance Framework in line with regulatory and international best practice, reinforcing the Bank's culture and core values.

Board Audit Committee (BAC)

Chaired by:
Carlos Obeid

The BAC oversees the integrity of the Group's financial reporting, including accounting policies and practices. It also provides oversight of the Internal Audit Framework, Compliance and Shari'ah Audit governance. The Committee monitors adherence to legal, regulatory and internal policy requirements, including consumer protection and recommends the appointment of the external auditor while maintaining an objective and transparent audit relationship.

Management Executive Committee (MEC)

Chaired by: **GCEO Ala'a Eraiqat**

The Board delegates day-to-day management to the MEC, consisting of the Bank's most senior executives. It is accountable for the Group's commercial, operational, risk and financial management, ensuring effective execution of strategy and policies in line with the Board's direction.

For further information on the relationship between the BAC and the external auditor, please refer to pages 64-66 of **2025 Integrated Report**

Board of Directors in numbers

Board members
11

Independent Directors[1]
8

Non-Executive Directors
100%

Number of Board and committee meetings[2]
44

Female Directors
c.20%

(1) According to the CBUAE's corporate governance regulation and standards, a Board director is categorised as non-independent when the length of tenure exceeds 12 years
(2) Includes 4 strategy sessions held by BEC

Appointment and re-election

ADCB recognises that an effective Board is essential to the Bank's success and its ability to act in the best interests of all stakeholders. In line with ADCB's Articles of Association and the CBUAE's Corporate Governance Regulations, all Directors are required to seek re-election by shareholders every three years.

If a Board seat becomes vacant, the Board may appoint an individual, typically nominated through the Nomination, Compensation, HR and Governance Committee (NCHRGC) process, to fill the vacancy for a period not exceeding 30 days.

The appointment shall be presented to the General Assembly at its first meeting for approval (or appointment of substitutes), and the newly appointed member will serve the remainder of the predecessor's term.

As at 31 December 2025, ADCB's majority shareholder, Mubadala Investment Company PJSC, held 60.69% of the Bank's share capital granting it the right to appoint six Directors in proportion to its shareholding, and exercise voting rights over an additional 6.14% during Board elections.

The selection and appointment process for Directors is set out in ADCB's Directors' Selection Policy, which outlines the fit-and-proper criteria and requirements for appointment in accordance with regulatory standards. As required by the CBUAE Corporate Governance Regulations, each Director must receive CBUAE approval as a proposed candidate before appointment or election at the General Assembly.

For further information on **ADCB's Board of Directors** please click here

Board induction

ADCB provides a comprehensive induction programme for all newly appointed or elected Directors. Each Director receives a formal, tailored introduction designed to help them perform effectively and develop a thorough understanding of the Bank's business.

The programme typically includes meetings with other Directors and Executive Management, as well as briefings from Senior Managers across key business areas and operations. New Directors are also offered opportunities to visit branches and departments to engage with subject matter experts. They receive detailed guidance on their duties, the Bank's policies and procedures, and applicable legal and regulatory requirements. Following the initial induction, Directors continue to enhance their knowledge of the Bank through ongoing meetings and engagements, as appropriate.

Board gender diversity

The Board plays a central role in fostering a strong, inclusive culture that reflects ADCB's values and long-term ambitions. The Bank recognises that diverse perspectives strengthen decision-making, innovation, and is committed to advancing gender diversity at the leadership level. As at 31 December 2025, women represented approximately 20% of the Board, in line with the Bank's diversity objectives as well as regulatory requirements. ADCB will continue to expand female representation by ensuring that at least 20% of candidates for directorship are women and that at least one woman serves on the Board.

Gender diversity on the Boards of Group subsidiaries

ADCB is committed to supporting gender diversity across the respective boards of Group subsidiaries in all operating jurisdictions, ensuring that each Board has a balanced mix of diverse perspectives, knowledge, skills, and experience to support and guide the organisation's strategic growth and operational objectives.

Subsidiary Board[1]	Total directors	Female directors	Female representation
Al Hilal Bank PJSC	7	1	14%
Abu Dhabi Commercial Bank – Egypt SAE	8	2	25%
Al Wifaq Investment Properties PrJSC	5	1	20%
ITMAM Services LLC	4	2	50%
ITMAM Services FZ LLC	1	1	100%
ADCB Asset Management Limited	2	1	50%
ADCB Markets (Cayman) Limited	1	1	100%
ADCB Finance (Cayman) Limited	1	1	100%
Al Hur 1 Holding Limited	1	1	100%
Al Hur 2 Holding Limited	1	1	100%
ITMAM for Outsourcing Services - Egypt	1	1	100%
Overall	**32**	**13**	**41%**
Boards of UAE subsidiaries	**21**	**8**	**38%**
Boards of international subsidiaries	**11**	**5**	**45%**

(1) The table lists only ADCB Group subsidiaries that have female representation on the board of directors

Board independence

Director independence is fundamental to effective governance and to ensuring decisions are made in the best interests of ADCB and its stakeholders. The Central Bank of the United Arab Emirates (CBUAE) sets clear independence criteria for board members under its Corporate Governance Regulations and Standards for Banks. These criteria are designed to preserve objectivity and uphold the highest standards of integrity, accountability and fiduciary responsibility.

The CBUAE Independence Criteria

a) The Director's tenure should not exceed 12 consecutive years from the date of appointment. This provision applies equally to appointments by a government shareholder

b) The Director or any of his/her first-degree relatives should not have been employed by the bank or its subsidiaries during the past two years

c) The Director should not have conducted any consulting services for the bank, or its subsidiaries, or acted in such capacity, either directly or indirectly, during the past two years

d) The Director should not have had any personal services contracts with the bank or its subsidiaries during the past two years

e) The Director should not be affiliated with any non-profit organisation that receives significant funding from the bank or its subsidiaries

f) The Director, or any of his/her first-degree relatives, should not be a partner or employee of the bank's auditor for the past two years

g) The Director or any of his/her first-degree relatives, should not have direct or indirect interest in any contracts and/or projects of the bank or its subsidiaries, where the total of such transactions exceeds the lower of 5% of the bank's paid share capital, or AED 5 million, or an equivalent amount in foreign currency, during the past two years, unless such relationship is part of the nature of the bank's business and involves no preferential terms

h) The Director and/or any of his/her first-degree relatives (individually or collectively) should not own, directly or indirectly, 10% or more of the bank's share capital or be a representative of a shareholder who owns, directly or indirectly, more than 10% of the banks' share capital

The provisions from items b) to h) do not apply to Board Members appointed by a Government shareholder, as per the CBUAE Corporate Governance Regulations.

The Government of Abu Dhabi entity, Mubadala Investment Company PJSC (Mubadala), owned 60.69% of the Bank's share capital as at 31 December 2025.

As an ADX-listed entity regulated by the CBUAE, ADCB determines the independence of its Board Members in accordance with the criteria outlined by the CBUAE.

As at 31 December 2025, the Board Members satisfied the prescribed CBUAE Independence Criteria, with the exception of Khalid Deemas Alsuwaidi, Khaled H. Alkhoori and Aysha Al Hallami, who are classified as non-independent due to their tenure exceeding 12 consecutive years on the ADCB Board.

Further information on Board Independence can be found in our **2025 Integrated Report –** page 26

Independent Directors[1]

73%

Length of Board tenure[1] (as at 31 December 2025)



0-2 years	H.E. Dr. Ahmed Mubarak Al Mazrouei (2024)
3-5 years	Fatima Al Nuaimi (2022) Sheikh Sultan Bin Suroor Al Dhaheri (2022) Sheikh Zayed Bin Suroor Al Nahyan (2021)
6–8 years	H.E. Khaldoon Khalifa Al Mubarak (2020) H.E. Hussain J. AlNowais (2019) Saeed Mohamed Hamad Al Mazrouei (2019) Carlos Obeid (2019)
9–12 years	Nil
12+ years	Aysha Al Hallami (2013) Khaled H. Alkhoori (2012) Khalid Deemas Alsuwaidi (2009)

Note: Figures may not add up due to rounding differences
(1) According to the CBUAE's corporate governance regulation and standards, a Board director is categorised as non-independent when the length of tenure exceeds 12 years

Board skills, experience and training

The expertise and competencies of Directors are assessed through a structured mapping exercise, which is updated as needed to ensure the Board's collective skills and experience remain aligned with the Bank's strategy and operating environment.

The Board brings a broad range of experience, covering finance, audit, accounting, risk management, governance, strategic planning, ESG, and information technology. The Board allocates appropriate time, budget, and resources to ongoing training and development and draws on external expertise when required. An annual review of training ensures that Directors continue to acquire and strengthen the knowledge and skills relevant to their responsibilities. The Board also engages regularly with Executive Management on specialised topics, ensuring continuous alignment on strategic and regulatory priorities.

The Board has direct access to the advice and expertise of the Group Company Secretary, who supports the Directors in fulfilling their fiduciary duties. Additionally, Directors may seek independent external professional advice at the Bank's expense on any matter they deem necessary to effectively execute their duties.

The 2024 skills evaluation cycle conducted in 2025 featured a strengthened methodology with deeper individual skillset assessments, enhanced collective suitability mapping aligned to CBUAE Fit & Proper expectations and expanded coverage of emerging areas such as ESG, AI, cybersecurity, and Islamic finance, providing the Board with a more comprehensive and forward-looking assessment.

The BEC is periodically updated on the implementation of the Sustainability strategy, any budget approvals for Sustainability initiatives, progress against the targets and any other activity as clearly defined in the terms of reference of the Group Sustainability Committee (GSC).

Industry experience of the Board aligned to CBUAE Fit & Proper expectations

Item	Agreement index (%)	Directors (Agree/Strongly Agree) out of 11
Individual Board Member skillset (Core Competencies)		
Understanding of banking and financial services	82	9
Knowledge of risk management principles and practices	82	9
Familiarity with corporate governance frameworks and best practices	73	8
Understanding of the regulatory environment	82	9
Knowledge of strategic planning and performance monitoring	82	9
Familiarity with sustainability and ESG matters	82	9
Experience/understanding of digital transformation and emerging technologies	82	9
Awareness of cyber security risk management	82	9
Familiarity with AML/CFT obligations	82	9
Understanding of outsourcing arrangements and associated risks	82	9
Knowledge of Islamic finance and Shari'ah compliance	73	8
Board engagement & interaction		
Awareness of group structure and interdependencies	82	9
Satisfied with time commitment for Board/Committee responsibilities	82	9
Active participation in Board discussions and decision-making	73	8
Access to training and development opportunities	82	9
Provided with tools and information to make informed decisions	73	8
Supported in disclosing and managing conflicts of interest	82	9
Appropriate interaction with Chairperson and Committee Chairs	82	9
Satisfied with oversight of long-term strategy and risk appetite	82	9
Collective suitability of the Board		
Collectively adequate knowledge of banking and financial services	82	9
Sufficient expertise in risk management and internal controls	82	9
Strong understanding of corporate governance and regulatory compliance	82	9
Well-informed about the Bank's strategic direction and performance	82	9
Necessary knowledge to oversee ESG and sustainability matters	73	8
Collectively aware of emerging risks, including cyber and digital transformation	82	9
Understanding of AML/CFT risks and obligations	73	8
Familiarity with outsourcing arrangements and associated risks	82	9
Clear understanding of Group-level risks and interdependencies	82	9
Includes members with knowledge of Islamic finance and Shari'ah compliance	82	9

In 2025, Directors participated in a number of training sessions

Training sessions

- Sanctions
- IFRS9 impairment treatment
- Sustainability and climate targets
- Operational resilience
- UAE legal and regulatory developments
- Funds transfer pricing
- Regulatory compliance covering key regulations issued since 2022
- Islamic banking and Shari'ah principles
- Higher Shari'ah Authority (HSA) standards and regulations

The BEC received the following key updates on sustainability in 2025:

- Annual update on progress against ADCB's sustainability strategy
- Awareness session on key ESG market trends and updates
- Updates on ESG strategic priorities in line with the corporate strategy
- Endorsement of climate targets

Board effectiveness and evaluation

The Board undertakes a formal and rigorous annual evaluation to assess its collective performance, the individual contributions of Directors, and the effectiveness of Board Committees in fulfilling their respective mandates. This evaluation process, guided by the Director's Performance Evaluation Policy, is essential to sustaining and enhancing the Board's expertise and effectiveness. By actively participating in the design, assessment and review of the process, the Board aims to identify achievements and areas for improvement. This structured and transparent evaluation approach reinforces trust among Directors, enhances alignment with Executive Management, and promotes confidence with the Bank's stakeholders.

The evaluation includes a specific review of the responsibilities and performance of the Chairman and the Chairs of each Board Committee, assessing the efficiency of meeting conduct, the facilitation of effective debate and decision-making and the external representation of the Bank to the public, regulators and other counterparties.

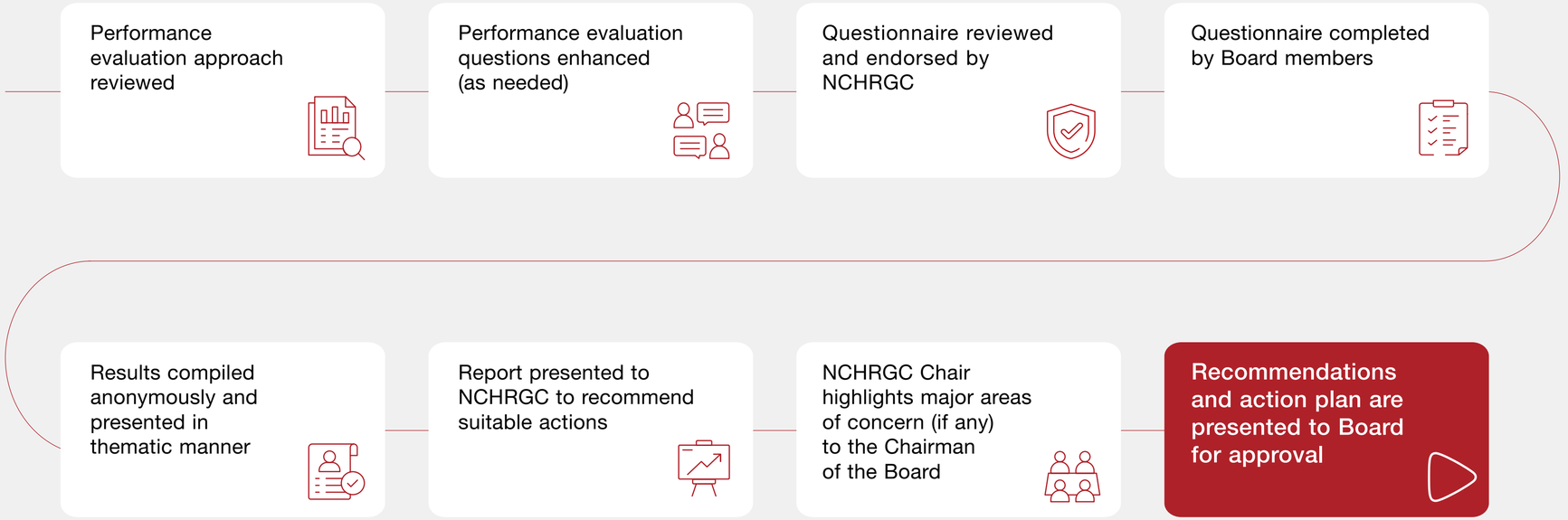
The Board Committees are evaluated on effectiveness in fulfilling their responsibilities, diligence, and responsiveness to the Board. Additionally, each Committee conducts an annual self-evaluation, to assess its ability to carry out the responsibilities set out in its terms of reference.

To ensure a robust and independent assessment of the Board's performance, an external consultant is appointed in the third year of the Board term to conduct an independent evaluation. The results are presented to the Nomination, Compensation, HR and Governance Committee (NCHRGC) as an actionable plan, with the Committee actively monitoring progress to support effective implementation. Following its review, the Chair of the NCHRGC briefs the Board of Directors on the outcomes. The Board Secretariat provides support to Directors and the NCHRGC throughout the evaluation process.

Board internal evaluation process

In line with the Directors' Performance Evaluation Policy, in 2025, the Board conducted its annual self-assessment for the prior year, facilitated by the NCHRGC with support from the Board Secretariat. The evaluation, conducted through a questionnaire, aimed to confirm the Board's effectiveness and ensure alignment with the size, complexity and risk profile of the ADCB Group.

The comprehensive questionnaire covered Board performance, Committee effectiveness, Secretariat support, individual competencies, and collective suitability in line with the CBUAE Fit and Proper Guidelines. Responses were collected anonymously and analysed in aggregate to ensure objectivity and confidentiality.



Summary of results:

The results of the internal Board evaluation indicate that the Board and its committees are performing effectively, with responses reflecting an overall positive assessment alongside areas identified for further consideration.

Board remuneration strategy and policy

ADCB's Board remuneration strategy reflects Directors' responsibilities and time commitments while aligning with industry standards and regulatory requirements. The core principle is to ensure remuneration is transparent, fair and commensurate with the Bank's strategic and operational objectives.

In accordance with the CBUAE Corporate Governance Regulations, the CMA Governance Guide and ADCB's Board Compensation Policy, Directors receive only fixed remuneration, with no incentive-based or performance-linked compensation. ADCB's Board remuneration consists of two components:

1) **Board remuneration:** annual fixed compensation for service on the Board, allocated based on role and responsibilities, with higher weightage for the Chairman, Vice-Chairman and committee chairs
2) **Sitting fees:** fixed amounts for participation in Board committees

The Nomination, Compensation, HR and Governance Committee (NCHRGC) is responsible for recommending the total Board remuneration to the Board, which, if endorsed, is submitted for approval by shareholders at the Annual General Assembly (AGA).

Remuneration is determined through a structured, benchmarked approach that considers peer practices and relevant internal and external factors, while remaining within a fixed compensation framework. No performance-based or incentive-linked pay is permitted.

The NCHRGC reviews Board remuneration annually and may propose adjustments within the fixed framework, subject to Board and shareholder approval. Non-monetary benefits such as Directors' liability insurance or healthcare may be provided, and Directors are reimbursed for costs directly related to their duties.

Board remuneration paid in 2025 for 2024

The total Board remuneration, paid in 2025, for the year ended 31 December 2024 amounted to AED 35,600,000. ADCB's Directors were not recommended for any additional allowances, salaries or fees, bonuses, long-term or other incentive schemes. Additionally, Directors do not receive any pension benefits from ADCB.

Further information on Board remuneration can be found in our **2025 Integrated Report** - page 39

Executive remuneration

The NCHRGC oversees the design, operation and effectiveness of the remuneration framework including allocation of awards, distribution among business lines and awards to Executive Management.

The NCHRGC also ensures that independent third-party reviews and assessments of the quantum, design and effectiveness of ADCB's variable pay framework and awards are conducted at least once every five years, in line with regulatory requirements. The last independent assessment was conducted in 2022 by Mercer.

ADCB uses a balanced scorecard approach to measure employee performance, including the following Key Performance Indicators (KPI) categories:

- Financial performance
- Non-financial performance
- Compliance, audit and risk

Further information on Executive remuneration can be found in our **2025 Integrated Report** - page 82

Sustainability is embedded in the heart of ADCB's performance management framework, with Management Executive Committee's remuneration linked to ESG KPIs. These include:

- Sustainability strategy milestones (included in the GCEO and GCFO's KPIs)
- Compliance and risk metrics
- Emiratisation targets
- Digital index
- Customer Net Promoter Score (NPS)
- Organisational Health Index (OHI)
- Risk Appetite Statement (including Sustainability targets) linked to the GCEO and GCRO's remuneration

Employee remuneration and reward

Guiding principles

ADCB is committed to providing competitive remuneration packages to attract, retain and motivate employees who consistently deliver exceptional service. The Bank's reward strategy is designed to minimise turnover among top talent, foster high-level performance and ensure robust risk management.

ADCB's remuneration framework is underpinned by policies and practices that ensure fairness and equity, reflecting roles and responsibilities appropriately. Rewards are consistently linked to organisational, departmental, and individual performance, determined through a rigorous performance management system and a disciplined review and approval process.

Reward governance

ADCB believes in, and is committed to, exemplary corporate governance, providing a foundation for sustainable development and performance. This commitment extends to all remuneration and reward matters. The Bank's governance framework promotes trust in reward-related activities, with ongoing Board-level oversight through the NCHRGC, which conducts regular independent reviews of the reward structure.

Total reward – key components

ADCB employees are eligible for three main types of rewards: fixed pay and benefits, variable pay and a profit-sharing plan. The remuneration program is structured to balance short-term and long-term incentives, aligning the interests of ADCB, its shareholders, and its employees.

Fixed pay and benefits

ADCB's fixed pay structure is designed to maintain market competitiveness. Fixed pay is determined by the scope and responsibilities of each role, their respective market pay levels, and the employee's contributions. Reviews of fixed pay are based on market benchmark and individual performance within the organisation. Fixed pay comprises basic salary and general allowance, typically split 50:50. Employees may also be eligible for specific allowances and benefits, as listed in the Components section.

Components

- Basic salary
- General allowance
- Social allowance (UAE nationals)
- Job-specific allowances
- Benefits based on position, such as: leave airfare, private medical insurance, life insurance coverage and education allowance

Variable pay (VP)

Variable pay may be awarded based on employee's annual performance. Given its performance-based nature, variable pay is not guaranteed and the amount received, if any, may vary each year. Variable pay awards are subject to deferrals, claw-backs and vesting provisions. Deferred variable pay vests in three years from the award date.

Performance criteria

Individual award amounts are determined by:

- Individual performance
- Business function performance
- Overall performance of the Bank

Deferred remuneration, as part of the Variable Pay Framework, encourages a focus on medium- to long-term business performance, fosters cross-business collaboration, and promotes a partnership mentality. It also aligns employees' interests with those of shareholders and supports the retention of employees who significantly impact the Bank's performance.

Profit-sharing plan

ADCB operates a share-based profit-sharing plan for key positions and high-performing contributors. The plan is designed to retain employees who make critical contributions, as well as top performers. Nominations for the profit-sharing plan are proposed based on strategic guidelines and validated by the NCHRGC. Profit-sharing awards vest after three years from the award date.

Selection criteria

Employees that the Bank seeks to actively retain:

- Employees in critical roles with active contributions to strategic projects, or whose contributions have a significant direct profit and loss impact in support of the Bank's strategic objectives
- Senior employees with active decision-making or advisory roles in subsidiary boards and oversight committees
- High potential and high performing local talent

Bank-wide variable pay framework

The variable pay framework aligns employee interests with the long-term objectives of the Bank and its shareholders, incentivising high performance while mitigating excessive risk-taking. Variable pay is tailored to each function to ensure market competitiveness.

Variable pay of the employees in Control functions is independent of the Bank's financial performance.

Variable pay framework key facts

- Reflects individual, business function and Bank-wide performance
- Differentiates between functions to ensure relevant market alignment
- Includes cash and/or shares and is deferred, above specified thresholds, for three years
- Subject to thresholds, caps, claw-back rules, malus clause, and deferral and retention provisions
- Managed by remuneration professionals experienced in the governance of all types of compensation and benefits
- Designed and reviewed in conjunction with independent external advisors reporting to the NCHRGC
- Relies on regular external benchmarking to ensure alignment with evolving local and global best practices
- Incorporates continuous monitoring of remuneration governance developments to ensure all VP plans remain in line with ADCB's requirements and external developments
- Designed to prevent excessive risk-taking
- Includes minimum shareholding requirements for key management
- Aligns employee interests with long-term interests of the Bank and its shareholders

Conflict of interest

The Board of Directors has established and maintains a comprehensive framework to identify and manage conflicts of interest across the organisation, including among the Bank's employees and Directors. This framework implements effective controls designed to prevent any adverse impact on the Group, its shareholders and other stakeholders.

Director conflict of interest

The Board has implemented a Directors' Conflict of Interest Policy to ensure that any actual, potential, or perceived conflicts involving Directors are managed in the best interests of the Group and its stakeholders. Directors are expected to avoid any activities that could create a conflict of interest, and they must promptly disclose any such matters to the Board and the Group Company Secretary. Directors are required to disclose their interests and relationships on appointment and provide updates on a quarterly basis. Any transaction in which a Director or related party may have a potential interest is subject to rigorous review and requires Board approval. Directors with such an interest must abstain from participating in discussions or voting on the matter.

The Board Secretariat maintains a register of Directors' conflicts of interests and related party transactions, capturing all declarations of interests made by Directors, along with the relevant detail. The NCHRGC reviews entries to the Register of Conflicts of Interests on a quarterly basis.

Employee conflict of interest

Employees must adhere to a Code of Conduct and Board-approved Conflict of Interest Policy, which require them to avoid conflicts of interest involving the Bank, its customers, suppliers and other counterparties. If an employee's outside interests conflict with the Group, they must promptly inform their line manager. In such cases, the transaction or account management must be assigned to another employee. Certain transactions may also require prior approval from Group Compliance. Employees are required to periodically disclose personal interests, including dealings with third-parties related to the Group.

Further information on conflict of interest and related party transactions can be found in our **2025 Integrated Report - pages 41-43**

Related party transactions

ADCB has implemented a comprehensive Related Party Transactions Policy that sets out procedures for identifying, evaluating, monitoring, and reporting the Group's exposures to related parties. In the ordinary course of business, the Group conducts transactions with various entities, including the major shareholder, related entities, associates, joint ventures, funds under management, directors, Executive Management, and entities related to the Government of Abu Dhabi. These transactions are carried out on an arm's-length basis at agreed interest and commission rates, and in accordance with relevant laws and regulations.

All Directors must disclose their related parties, transactions, and potential conflicts upon appointment and thereafter on a quarterly basis. The Board Secretariat maintains a register of Directors' conflicts of interest and related party transactions. The declarations are reviewed quarterly by the NCHRGC.

Based on written declarations of interests submitted by each Director, the Board ensures that any external commitments do not conflict with the Director's duties and responsibilities. Where conflicts may arise, the Board remains sufficiently informed, with policies and procedures in place to mitigate any associated risks.

Definition of related party

Related party includes the parent and its related entities, directors and senior management of ADCB and their related entities, associates, joint ventures, funds under management and the Government of Abu Dhabi (ultimate controlling party and its related entities).

Mubadala holds 60.69% of the Bank's issued and fully paid-up share capital. As the Government of Abu Dhabi owns 100% of Mubadala, it is considered as the ultimate controlling shareholder. Therefore, all other entities controlled or associated with the Government of Abu Dhabi are deemed as related parties of the Group.

Major shareholder and its related parties

Transactions between ADCB and its majority shareholder and subsidiaries are disclosed in the Bank's 2025 Integrated Report.

Associates, joint ventures and funds under management

The Group may provide banking services to its associates, joint ventures and funds under management in the ordinary course of business, from time to time. However, such banking services rendered are always conducted on an arm's length basis.

Directors and their related parties

To ensure transparency and prevent conflicts of interest, the Bank has implemented robust controls for managing related party transactions involving Directors or their related parties. These controls require Directors to refrain from participating in discussions of, or voting on, transactions in which they have an interest, thereby promoting a transparent and impartial decision-making process.

Risk management and cybersecurity

Why it matters

Recognised as a systemically important bank in the UAE, ADCB places effective risk management at the core of its decision-making processes across all levels of the organisation. The Bank embeds a strong culture of risk awareness and maintains vigilant monitoring of new and emerging risks, ensuring organisational agility to identify and adapt swiftly. Robust risk governance and advanced resilience to cybersecurity and data privacy risks, including the responsible use of AI, enable ADCB to protect its customers and capitalise on digital transformation opportunities. Inadequate risk management could expose the Bank to financial loss, regulatory action or reputational harm.

ADCB's approach and progress

The Bank's approach to risk management is built on an integrated risk management framework that ensures risks are identified, measured and controlled across the Group. The framework is supported by a three lines of defence model, ensuring clear accountability between business units and control functions. The Board Risk Committee oversees the Bank's risk strategy and appetite, chaired by the Group Chief Risk Officer (GCRO).

Further details on **risk management** can be found on pages 169-179 of the 2025 Annual Report

ADCB articulates its risk tolerance through a comprehensive Risk Appetite Statement (RAS), which informs the Bank's overall approach to risk in pursuing its strategic objectives. In parallel, the Bank's Risk Appetite Framework provides a clear mechanism for the Board and Board Risk Committee (BRC) to define and communicate the level of risk the Bank is prepared to assume in achieving its annual business plans and long-term vision. The framework outlines principal risks and the Bank's approach to identifying, measuring, monitoring, and mitigating material risks, ensuring accountability across all levels of the organisation.

ADCB conducts an annual systematic review and challenge of its risk appetite before presenting it to the BRC for discussion, endorsement and approval by the full Board. This process aligns risk at individual, departmental, functional and portfolio levels with the overall Group appetite, and ensures that the risk framework, processes and procedures are consistent across the organisation.

2025 risk management enhancements

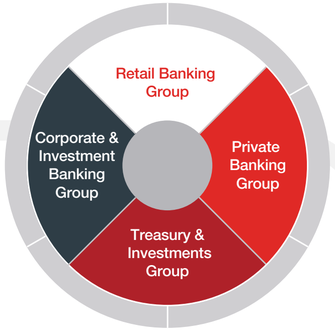
1. **Strengthened governance and culture:** reinforced risk culture and oversight across all lines of defence
2. **Digital risk management refined:** AI governance and model risk controls embedded within the enterprise risk framework
3. **Deployment of AI to support resilience:** expanded deployment of AI across fraud detection, cyber resilience and credit risk oversight
4. **Integrated ESG and climate risk:** inaugural ICAAP[1] climate stress test conducted, strengthening governance of climate-related risks

Comprehensive risk management framework

ADCB operates a 'three lines of defence' model that defines accountabilities and responsibilities across the organisation. This structure ensures clear ownership of risk, effective oversight and collaboration between the business, control and assurance functions.

1 First line of defence

The Bank's business lines, plus technology and operations, own the risks and are responsible for identifying, recording, reporting and managing them, and ensuring the right controls and assessments are in place to mitigate them



2 Second line of defence

The Bank's risk control and compliance oversight functions set the policy and guidelines for managing specific risk areas, provide advice and guidance in relation to the risk, and challenge the first line of defence on effective risk management and design

Fraud | Operational resilience | Information security | Treasury, market & liquidity risk | Credit risk | Data management | Compliance | Internal Shari'ah control

3 Third line of defence

The Bank's Internal Audit function provides independent and objective assurance of the adequacy of the design and operational effectiveness of the Group's risk management framework and control governance process

Internal Audit function

(1) ICAAP: Internal Capital Adequacy Assessment Process

Risk management framework (cont'd)

In 2025, the Bank enhanced its Principal Risk Framework through the formal inclusion of ‘strategic’ and ‘people’ risks, reflecting the importance of effective strategic execution and maintaining a resilient, skilled workforce as well as ADCB’s stature as a major UAE financial institution. The identification of principal risks promotes effective oversight of factors that may influence the Bank’s performance and long-term objectives.

Principal risks

- Capital risk
- Compliance/ regulatory risk
- Conduct risk
- Credit risk
- Data privacy/quality and protection risk
- Financial crime risk
- Cybersecurity and technology risk
- Liquidity and funding risk
- Market risk
- Model risk
- Operational risk
- Reputational risk
- Sustainability risk
- Islamic banking risk
- Anti-bribery and corruption risk
- Digital risk
- Fraud risk
- Strategic
- People

Further information on ADCB’s principal risks can be found in the **2025 Annual Report** - pages 172–179

Risk governance

ADCB’s governance model is anchored in rigorous oversight and a proactive risk culture. Regular meetings of the Board Risk Committee, Risk Management Committee, Model Risk Management Committee, and specialised working groups ensure that risk issues are reviewed comprehensively and addressed promptly. Monthly portfolio reviews assess performance against the Bank’s risk appetite and promote early identification of trends or vulnerabilities.

Roles & responsibilities

Board of Directors	Establishes and promotes a strong control environment via the Board Risk Committee (BRC)
Management Executive Committee	Oversees implementation of risk frameworks and ensures alignment with business strategy
Risk Management function	Provides independent governance, compliance monitoring, and enterprise risk oversight
Business line management	Owns risk within business activities and ensures effective first-line controls
Internal audit	Provides independent assurance on the effectiveness of the overall risk management framework

A range of risk related meetings were undertaken in 2025 through the following:

- Board Risk Committee
- Risk Management Committee
- Model Risk Management Committee
- Internal Shari’ah Supervisory Committee
- Data Steering Group
- Environmental and Social Risk Management (ESRM) Working Group
- Operational Risk Working Group
- Information Security Working Group
- Fraud Risk Taskforce

Artificial Intelligence (AI) risk governance

In 2025, the Risk Management function also played a key role in integrating risk considerations into the Bank’s digital technology programmes, embedding risk controls into AI and data initiatives, and reinforcing accountability across all business units.

This included the establishment of an AI Risk Forum, a cross-functional governance body that oversees AI risk across the lifecycle, ensures responsible AI adoption aligned to global standards, and prepares the Bank for emerging regulatory obligations while reinforcing operational resilience.

Further information on **ESRM governance** can be found on pages 41–42 of this report

Emerging risks

ADCB recognises a dynamic risk landscape shaped by digital acceleration, geopolitical change and sustainability imperatives. Key emerging risks include:

- **AI and model risk:** governance challenges related to bias, explainability and regulatory scrutiny, requiring enhanced validation and independent oversight
- **Cyber and data security:** escalating risks of AI-driven fraud, ransomware and deepfake-enabled attacks, demanding continuous innovation in defence and detection
- **Climate transition risk:** impact on credit, market, operational and reputational risks, driven by decarbonisation and regulatory change
- **Regulatory and compliance pressure:** expanding supervisory requirements across digital assets, data protection and ESG standards
- **Third-party risk:** growing reliance on cloud and technology vendors, necessitating stronger contractual controls and monitoring
- **Fraud and financial crime:** rising sophistication of scams and identity theft, addressed through real-time detection, behavioural analytics and biometrics

Cybersecurity

Cybersecurity is a top priority for ADCB due to the increasing sophistication of cyberattacks. The Bank is investing in new tools and staff training to enhance its defences and to ensure it is well prepared for ransomware and other cyber threats. Concrete steps have also been taken to protect customers from cyber threats, such as the introduction of enhanced risk-based authentication measures and facial recognition technology. These advances not only reduce the risk of customers falling victim to cyber threats, but also contribute to an improved customer experience and increased trust in banking services.

ADCB has established a comprehensive Cybersecurity Policy covering all information assets, services, documents, and devices owned or managed by the Bank and connected to its network. The policy aims to safeguard the Bank's assets, ensure the security and continuity of information systems and data, and support the achievement of business objectives. It also ensures that information security risks are identified, assessed, and mitigated to acceptable levels, while meeting all contractual, legal, and regulatory requirements.

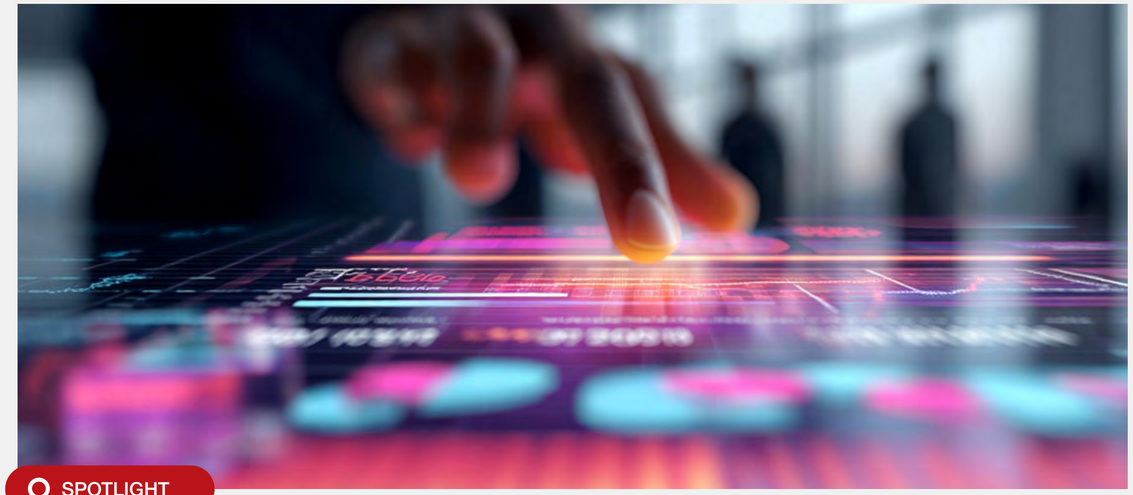
ADCB operates a cybersecurity action plan and a rigorous testing regime, using internal and external testing teams to verify controls. In addition, the Bank engages specialist experts to provide immediate technical support and advice if a cybersecurity event were to occur. ADCB has also developed a cyber-threat communications playbook to help manage such an event and communicate effectively with stakeholders.

Regular simulation exercises are conducted to maintain a high level of preparedness for respondents to act effectively in case of any type of cyber incident. Threat intelligence gathering has also been strengthened with additional sources of new threats continuously fed into the security operations center.
The Bank conducts ongoing cyber-awareness campaigns and simulated phishing exercises.

Cybersecurity risk governance

Accountability for managing information security risk lies with the Bank's governance bodies, including the Board of Directors, Board Risk Committee, Risk Management Committee, and Information Security Working Group.

The accountable executive is the Chief Information Security Officer (CISO), reporting to the Group Chief Risk Officer (GCRO), who reports to the Risk Management Committee (RMC) and the Board Risk Committee (BRC).



SPOTLIGHT

Strengthening digital and cyber resilience

As technology continues to evolve, the Bank's approach to managing digital risks adapts accordingly. Technology adoption, including AI, cloud services and automation, is governed by structured risk assessments and regulatory alignment. The information security team collaborates with digital transformation and IT functions to evaluate emerging risks linked to data privacy, algorithmic decision-making and third-party cloud providers.

ADCB's comprehensive strategy for information security revolves around regular security assessments and technological upgrades. A key component of this approach is the implementation of an AI-powered detection and response system, which bolsters defences against cyberattacks, unauthorised access attempts, and potential data misuse.

ADCB has established principles, policies, and practices to ensure the responsible and effective governance of AI systems across the Bank. ADCB's Gen AI Policy ensures the legal and responsible use of generative AI technology within the Bank and across its information assets.

This forward-looking approach ensures the Bank remains resilient as the technology landscape shifts. In 2025, the Bank successfully conducted enterprise-wide business continuity and cyber-resilience tests covering multiple scenarios, including disaster-recovery and system-outage simulations. These exercises validate the resilience of critical operations and recovery time objectives across the Group.

Information security third-party ratings

riskrecon

9.6 out of a maximum score of 10

Risk Recon[1], a leading global cyber risk rating agency from Mastercard, employs passive, non-invasive techniques to discover the organisation's public systems and to analyse the cybersecurity risk posture of those systems, with a rating scale of 0-10. ADCB achieved an overall score of 9.6/10 with the highest 'A' rating ('Advanced Level') from RiskRecon, compared to an industry peer average of 8.3. This reflects the Bank's robust approach to managing the evolving threat landscape.

MSCI

7.3 out of 10[2]

MSCI ESG ratings rank ADCB above the industry average on 'Privacy and Data Security'. This assessment is based on evaluation of the amount of personal data collected, exposure to evolving or increasing privacy regulations, vulnerability to potential data breaches and systems for protecting personal data.

MORNINGSTAR SUSTAINALYTICS

1.5 - negligible risk[3]

Sustainalytics has assigned ADCB an ESG risk rating of 1.5, indicating negligible risk on 'Data Privacy and Cybersecurity'. This places the Bank in the top 3rd percentile of global banks within the ESG risk rating universe.

Information security certifications

PCI Security Standards Council

Payment Card Industry Data Security Standard

The Payment Card Industry (PCI) Data Security Standard (DSS) is an information security standard for organisations that handle branded credit cards. The PCI Standard is mandated by the card brands and is administered by the Payment Card Industry Security Standards Council. The standard was created to increase controls around cardholder data to reduce credit card fraud.

- **Scope of certification:** The certification covers payment card related services provided by the Bank
- **Frequency of audits:** External independent audits are conducted on an annual basis as a part of PCI DSS compliance certification

Swift

SWIFT Customer Security Programme

SWIFT's Customer Security Programme helps financial institutions ensure their defences against cyberattacks are up to date and effective. Security measures implemented by the Bank are compared against the Customer Security Controls Framework (CSCF) annually through an independent external assessment to verify compliance.

- **Scope of certification:** The certification covers the information security controls compliance to Customer Security Control Framework in line with requirements of SWIFT for the Bank's digital channels
- **Frequency of audits:** External independent audits are conducted on an annual basis as a part of SWIFT CSCF certification

TRA هيئة تنظيم الاتصالات TELECOMMUNICATIONS REGULATORY AUTHORITY

UAE Information Assurance (IA)

The UAE IA Regulation provides management and technical information security controls for entities to establish, implement, maintain, and continuously improve information assurance.

A risk based approach is followed by ADCB for the implementation of the IA controls.

- **Scope of certification:** The certification assesses 60 management controls and 128 technical controls
- **Frequency of audits:** The assessment is conducted by an independent third-party annually



SPOTLIGHT

ISO 27001 Information Security Management System[4]

ISO 27001 is the global standard for the protection of information security. It details the requirements for establishing, implementing, maintaining and continually improving the information security management system. The standard helps organisations make information assets more secure.

Scope of certification

The certification covers the information security of the Bank's digital channels. All customer facing applications are included in the scope of ISO 27001 certification.

Frequency of audits

External independent audits are conducted on an annual basis as a part of ISO 27001 certification.

(1) https://www.riskrecon.com/cybersecurity-risk-rating-model
(2) As at March 2026
(3) As at October 2025. ESG risk rating score ranges from 0 to 40+ (0=lowest risk)
(4) ADCB UAE is certified to ISO 27001. The scope of this certification covers the information security management of the Bank's digital customer channels

Data management and privacy

ADCB and its subsidiaries are committed to protecting the privacy and confidentiality of customers' personal data, managing customer and other sensitive data with care and respect. ADCB's Privacy Notice is aligned with the UAE personal data protection laws and is guided by the principle of treating data as an asset. The Bank has identified data privacy, data quality and data protection risk as a principal risk, recognising that protecting the privacy rights of customers, employees, and third-parties is both a regulatory requirement and an ethical responsibility.

The Bank's Data Privacy Office (DPO) develops and enhances privacy practices in alignment with the evolving data protection landscape. One of its key responsibilities is to ensure that 'privacy by design' and 'privacy by default' are embedded within the Bank's operations. The DPO is responsible for reporting to regulators in line with the requirements of the various jurisdictions in which we operate. A dedicated Data Protection Officer is accountable for the Bank's compliance with data privacy regulations and all data protection matters. The Data Privacy Office also collaborates closely with business units, legal, compliance, and IT to embed privacy into the Bank's operations and ensure a consistent, risk-based approach to Data Protection across the Group.

Each subsidiary within the Group maintains its own privacy notice reflecting its business activities, regulatory requirements and legal obligations. These subsidiary-specific notices operate under the Group's overarching privacy governance framework and ensure transparency about how data is collected, used, stored, and processed.

Please click here for
ADCB's Privacy Commitment

Data management governance and operating model

The data management governance and operating model is designed to ensure effective oversight, clear accountability, and proactive management of data related risks across the Group.

Tier 1 Board-level and Executive Management data governance and oversight

- **Board Risk Committee (BRC)**: provides strategic oversight and Board level engagement, offering assurance that data privacy, quality and governance risks are appropriately managed and that material issues are escalated and addressed.
- **Risk Management Committee (RMC):** provides executive level operational oversight and coordination, ensuring effective implementation of approved frameworks, alignment across business and control functions, and timely management of data related risks.
- **Data Steering Group (DSG):** responsible for driving execution, monitoring performance, identifying issues and emerging data-related risks. The DSG oversees the implementation of Group-wide data management frameworks, monitors key risks, reviews remediation actions and escalates material issues to Executive Management as required.

Accountable executives and teams:

- Group Chief Risk Officer
- Senior Head of Data Management
- Compliance and business teams

Tier 2 Data privacy champions and data stewards

- Data privacy champions and data stewards, representing subject matter experts, act as the first point of contact within business areas. They ensure departmental compliance, support risk assessments and remediation activities and act as a bridge between business units and central governance functions.

Tier 3 Departmental staff

- Departmental staff collaborate with data privacy champions and data stewards to embed data privacy, quality and governance requirements into day-to-day operations. They ensure that data is handled responsibly and addressed in line with Group policies and procedures.

Data Privacy Office (DPO)

- The DPO at ADCB operates as a strategic governance and oversight function within Group Risk Management. Its core mission is to ensure the lawful, ethical and secure handling of personal and sensitive data across the Bank and its subsidiaries, in alignment with applicable regulations and international standards.

  The DPO is responsible for developing and maintaining data privacy policies, conducting privacy impact assessments, overseeing incident response, and monitoring regulatory developments. It operates with a high degree of independence and reports to senior leadership through the Board Risk Committee.

Data Governance function

- Data Governance function ensures oversight, mitigates data risks and upholds data quality standards to support decision-making and innovation.

Collection and retention of personal data

ADCB uses account holder information exclusively for the primary purposes for which it was collected, and does not process such data for unrelated or secondary purposes without obtaining explicit consent. Customer data may include identification and contact information as well as transactional records. This is stored securely in line with appropriate technical and organisational safeguards.

Retention of customer information is limited to:

- the period required to fulfil the purpose for which it was collected
- to comply with applicable legal or regulatory requirements
- to address legitimate business and risk management needs

ADCB recognises and upholds the rights of individuals regarding their personal data, as set out in its Privacy Notice. Customers have the right to access their personal data, request corrections, or seek deletion of their personal data, where applicable. To exercise these rights, customers can follow the process outlined in the Bank's Privacy Notice. Requests are handled in line with internal policies and procedures and processed within regulatory acceptable timelines.

Through this approach, ADCB ensures every subsidiary and business unit maintains consistent, transparent, and lawful data handling practices that uphold customer trust and align with the Bank's broader commitment to responsible governance and data ethics.

ADCB is committed to responsible data management. The Bank limits the collection and retention of personal data to what is necessary to deliver services, manage customer relationships, prevent fraud, meet regulatory and legal requirements, and support ongoing enhancements in service delivery.

Data protection awareness and training

ADCB fosters a strong culture of data privacy and protection through a comprehensive training and awareness programme. In 2025, the Bank expanded its efforts in this area with mandatory annual e-learning for all employees, onboarding modules for new hires, and targeted and specialised sessions for business units and subsidiaries.

The Bank's training and awareness programme covers key topics such as:

- Data protection regulations
- Best practices for handling personal data
- Responsible data sharing practices
- Consequences of data breaches

This is essential for ensuring all employees, consultants, and independent contractors understand the importance of data privacy and their role in protecting sensitive information.

The programme also includes specialised training for executives and legal teams, practical tools for safeguarding personal data, identifying privacy roles in contracts, and guidance on data breach notification timelines. By fostering a culture of vigilance and responsibility, the Bank ensures employees are equipped with the knowledge and tools they need to safeguard sensitive information and data.

Employees trained on data privacy and protection[1]

96%

Vendor due diligence

ADCB Group engages third-party vendors and partners to support its operations. To safeguard data and ensure compliance with UAE and international privacy regulations, the Bank applies a consistent and structured third-party privacy risk framework. This framework governs the entire third-party lifecycle and includes:

- Risks assessment pre-engagement and during the third-party lifecycle
- Contractual data protection clauses which caters for data breach notifications
- Training and awareness initiatives on an ad hoc basis
- Ongoing monitoring
- Vendor self-attestation

These measures ensure ADCB data remains protected throughout the third-party lifecycle.

Managing data privacy risks

ADCB has undergone a significant transformation in its data management practices, shifting from reactive compliance to a dynamic, proactive approach that adapts to evolving jurisdictions, operational complexities, and regulatory landscapes. Recent revisions of the Group data strategy emphasise enhanced governance and the operationalisation of 'privacy by design' principles.

Core principles driving the transformation:

- **Data federation:** establishing data ownership within business units to foster agility and accountability
- **Data efficiencies:** streamlining data flows through platform integration and process optimisation
- **Producer-consumer collaboration:** enhancing cross-functional alignment between data creators and users
- **Governance and oversight:** strengthening governance through updated frameworks, policies and procedures
- **Privacy and protection:** enhancing data risk assessments to strengthen data breach investigation, reporting and escalation
- **Continuous monitoring:** embedding risk and impact assessment programmes within business units to strengthen controls and data practices

This transformation strengthens the Bank's data management framework, enabling it to respond effectively to evolving regulatory requirements and business needs. It supports the consistent application of policies, controls, and standards, ensuring data remains reliable, compliant, and used appropriately across the organisation.

(1) ADCB UAE and AHB UAE only





SPOTLIGHT

Recognition of privacy and cybersecurity practices by ESG ratings agencies

ADCB's commitment to responsible data management and privacy practices has significantly contributed to the Bank's improved ESG risk ratings. Sustainalytics, one of the world's leading ESG rating agencies, ranked ADCB in the top third percentile of regional and global banks for data privacy and cybersecurity. Similarly, MSCI and S&P ESG ratings ranked ADCB above the industry average on 'Privacy and Data Security'(1).

These assessments reflect the Bank's strong internal controls, including data access governance, breach response protocols, and third-party data protection programmes. The ratings also recognise ADCB's structured privacy governance model, employee training initiatives, and supplier oversight mechanisms. The Bank remains committed to continuous improvement in data privacy and cybersecurity, with ongoing investments in technology, awareness, and regulatory alignment to maintain its leadership position.

Sustainalytics risk rating on data privacy and cybersecurity(1)

Top 3rd percentile

Among global and regional banks

Risk rating for data privacy and cybersecurity

1.5 ("Negligible risk")

Negligible (0–10)	Low (10–20)	Medium (20–30)	High (30–40)	Severe (+40)

Best — Worst

Empowering customers through data privacy awareness

ADCB recognises data as a critical asset and is committed to safeguarding the privacy and security of customers' personal information. As part of its responsible banking approach, the Bank has implemented a structured customer awareness programme focused on data privacy and protection.

This initiative is integrated into ADCB's broader financial literacy and digital inclusion agenda, reinforcing the UAE's vision of a secure and inclusive digital economy - and reflecting the Bank's belief that transparent data practices are foundational to long-term customer trust.

An example of 'Data privacy and protection consumer awareness guide' can be found on the **ADCB website**

Educating for empowerment

Through its consumer education platform, ADCB provides clear and practical guidance to help customers safeguard their personal and digital information. This includes awareness of what constitutes personal data, how the Bank protects data through robust controls and monitoring, and how customers can protect themselves against risks such as phishing and fraud.

Championing data protection rights

ADCB ensures customers are informed of their data protection rights, including the ability to access and correct personal data, request data deletion under specific conditions, and withdraw consent for data processing. These rights are supported by clear communication and responsive customer service channels.

(1) As at December 2025

Financial crime, anti-bribery and corruption

Why it matters

Financial crime, corruption and bribery are recognised as growing risks in the global economy, particularly for banks. An effective financial crime prevention framework reduces ADCB's exposure to heightened risks of money laundering, terrorist financing, bribery and corruption. Ineffective management of financial crime risks may lead to regulatory fines, litigation costs and reputational damage, potentially undermining stakeholder confidence in the Bank.

Percentage of workforce formally trained on anti-corruption/bribery[1]

100%

Please click here for **ADCB Financial Crime Policy Statement**

ADCB's approach and progress

ADCB Group continues to maintain the highest ethical standards and compliance with all applicable laws and regulations. The Bank advocates the prevention of all forms of financial crime, including money laundering, terrorist financing, bribery and corruption, the intentional evasion of sanctions, and proliferation financing. The Group recognises financial crime risk management as a fundamental pillar of its business.

ADCB's Financial Crime Compliance (FCC) framework sets out a comprehensive, risk-based approach for identifying, mitigating and managing financial crime risks. The framework integrates Anti-Money Laundering (AML), Combating the Financing of Terrorism (CFT), sanctions compliance, proliferation financing and Anti-Bribery and Corruption (ABC) within a single Group-wide architecture. It is aligned with CBUAE guidance on AML/CFT and sanctions compliance, as well as the Financial Action Task Force (FATF) recommendations, the Wolfsberg Group Principles on ABC and international best practice.

Strong governance and clearly defined accountability underpin the effective implementation of this framework across the Group. ADCB's Money Laundering Reporting Officer (MLRO) leads a team of experienced compliance analysts and specialists who manage financial crime risks.

ADCB's governance and control model to mitigate corruption and financial crime risks

The Bank has implemented a robust model for the prevention, identification, and internal reporting of corruption and financial crime.

FIRST LINE

ADCB's business and operational units are accountable for managing financial crime and corruption risks in their day-to-day activities. These teams ensure that controls are properly executed, records are maintained, and issues are escalated promptly.

Record keeping and operational controls
Business units maintain accurate and timely records of all transactions, customer interactions, and approvals in line with UAE regulatory requirements and internal policies. Core systems include secure audit trails to ensure transparency and full traceability of actions.

Approval workflows and escalation
Frontline processes operate within system-embedded approval workflows that enforce segregation of duties and prevent unauthorised actions. Staff are required to escalate irregularities or suspected breaches to compliance and risk functions through formal reporting channels.

Frontline governance
Senior management review and approve higher-risk customer relationships and activities, ensuring alignment with policy requirements and regulatory expectations.

SECOND LINE

Independent risk and compliance functions oversee the effectiveness of ADCB's financial crime and corruption risk management framework, providing guidance, monitoring and appropriate challenge to the business.

Compliance frameworks and regulatory engagement
Dedicated financial crime compliance teams oversee adherence to AML/CFT & ABC frameworks and maintain ongoing engagement with regulators.

Risk assessment and monitoring
Enterprise-wide financial crime risk assessments are conducted regularly, incorporating emerging typologies and sector-specific vulnerabilities.

Policies, training and awareness
Group-wide policies and mandatory training programmes reinforce ethical conduct, control requirements and reporting obligations.

THIRD LINE

Independent assurance provides objective assessment of the effectiveness of ADCB's financial crime and corruption governance, controls and risk management framework.

Internal audit reviews
Internal audit conducts independent assessments of control effectiveness and reports findings to the Board Audit Committee.

Regulatory examination
The Central Bank of the UAE conducts independent supervisory examinations of ADCB's financial crime framework and controls.

(1) Reported as Code of Conduct training for all employees (incorporating anti-bribery and corruption principles) and targeted ABC training for new hires as part of induction program

Financial Crime Compliance (FCC) Framework

ADCB maintains a robust Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) Framework that complies with all applicable laws. The Bank has established a 'Know Your Customer' (KYC) and AML/CFT policy to ensure:

- All employees are informed on the minimum AML/CFT control standards that apply across the Bank
- Any AML/CFT risks are mitigated appropriately
- Any prohibitions which fall outside the Bank's risk appetite are clearly stipulated

Suspicious transaction reporting

ADCB maintains a robust approach to Suspicious Transaction Reporting (STR), ensuring timely identification and escalation of unusual activity to the Money Laundering Reporting Officer, in full compliance with UAE regulatory requirements.

Record keeping

All AML-related documentation, including investigation reports, STRs, and other supporting records, is retained in strict compliance with UAE regulatory requirements as outlined in ADCB's AML Policy. The statutory retention period for such records is a minimum of five years, with extended retention applied where required by regulatory, supervisory, or legal obligations.

Retention controls are embedded within ADCB's systems to ensure secure storage, auditability, and timely disposal in accordance with regulatory and policy requirements.

Politically exposed customers

In accordance with UAE AML/CFT regulations and ADCB's internal governance framework, the onboarding or periodic review of Politically Exposed Person (PEP) relationships requires multi-tiered approvals. These include:

- Business Unit Head – to confirm commercial rationale and risk acceptance
- Group Head – to provide senior-level oversight and ensure alignment with risk appetite
- Compliance (Client acceptance advisory/MLRO) – to validate enhanced due diligence measures, source of funds verification, and adherence to regulatory obligations

This reflects the regulatory emphasis on enhanced due diligence for PEPs, risk-based decision-making, and documented senior management involvement as required under UAE AML/CFT regulation and the CBUAE Rulebook.

> External regulatory assessments are conducted regularly by the CBUAE and other competent authorities to ensure compliance with applicable AML/CFT laws

Initiatives adopted in 2025 to strengthen the Compliance Framework

ADCB continues to enhance its Financial Crime Compliance framework through advanced technology, process optimisation and strengthened policies. Significant achievements in 2025 included:

AML/CFT and sanctions enterprise-wide risk assessment (EWRA)

ADCB completed its annual AML/CFT and sanctions EWRA using its fully automated solution, continuing to improve efficiency and consistency across business line evaluations.

Transaction monitoring

The Bank incorporated dedicated detection models for correspondent banking money laundering and trade-based money laundering, enhancing risk sensitivity and overall effectiveness.

Virtual asset risk management framework

ADCB implemented an AML/CFT risk management framework for Virtual Asset Service Providers (VASPs), including onboarding standards, monitoring procedures and blockchain analytics. The Bank also established client money accounts for VASPs subject to the CBUAE's case-by-case approval and positioning ADCB as an early mover in this capability.

Proliferation financing detection

The Bank strengthened its ability to detect proliferation financing risks through enhanced training and awareness programmes, resulting in stronger risk mitigation and improved regulatory reporting. This is further complemented by the Bank's Proliferation Financing Risk Assessment.



SPOTLIGHT

Robust oversight on financial crime compliance

Governance of the FCC Framework is exercised through multiple layers of oversight. The Board Audit Committee (BAC) oversees the activities and performance of the Bank in line with all compliance policies and standards. The Management Compliance Committee (MCC) provides senior management oversight and challenge over the AML/CFT and Sanctions and Counter Proliferation Financing, including policies, risk assessment methodologies, regulatory findings, and remediation, with escalation to Executive Management and BAC where material risks or delays arise.

Day-to-day management is led by the Group Chief Compliance Officer and the Money Laundering Reporting Officer (MLRO), supported by a dedicated FCC function operating across business lines and geographies. This ensures a consistent application of policies and controls throughout the Group.

Managing sanctions and proliferation risk

ADCB has developed a comprehensive ‘Sanctions and Counter Proliferation Financing Programme’ to enable the Bank to effectively evaluate and address risk exposures. The Policy supports the identification and management of sanctions risks by ensuring ADCB does not participate in any activity that could expose the Bank, its customers, employees or counterparties to sanctions and proliferating financing risk. This includes the proliferation of goods that can or will be used for the purpose of developing, producing or manufacturing chemical, biological or nuclear weapons. The Bank’s Sanctions Control Framework monitors and adapts to major changes in both regulation and international sanctions programmes.

Enhancements to sanctions compliance

The Bank has implemented significant enhancements to its automated screening systems, process flows, risk assessments and team capabilities. This includes major upgrades to the infrastructure of automated tools for detecting potential sanctions and proliferation risk in payment flows. These are complemented by additional intelligence data feeds covering areas of risk exposure not included in conventional sanctions lists.

In addition, ADCB regularly conducts proliferation financing risk assessments to detect and mitigate proliferation financing risks, while the Bank continues to utilise both targeted and enterprise-wide assessments adapted to the evolving risk environment.

Further AI automation is planned in 2026 to further strengthen risk detection capabilities and increase efficiency in sanctions alert processing.

Anti-Bribery and Corruption (ABC)

ADCB maintains a zero-tolerance approach to bribery and corruption. This is reinforced through the Bank’s Code of Conduct, which all employees are required to acknowledge annually, and through the Bank’s Anti-Bribery and Corruption (ABC) Policy, which prohibits facilitation payments, political contributions, and any behaviour that could constitute or enable bribery and corruption. Employees are also expected to ensure any hospitality, gifts or business courtesies provided or received do not violate any applicable law, regulation, or policies of ADCB Group.

The policy prohibits facilitation payments of any kind. It also prohibits political contributions or donations being made on behalf of the Group, a subsidiary or its international offices. Employees are required to report any suspected or actual violations of the policy, or any applicable laws or regulations, to the Anti-Bribery and Corruption Officer, or via one of the Bank’s whistleblowing channels.

All employees receive mandatory training on the Bank’s ABC policy, along with regular refresher sessions to keep their knowledge up to date. This helps to ensure they have the skills and understanding to promptly identify and report incidents of corrupt and unethical practices.

In addition, ADCB’s Vendor Code of Conduct aims to uphold the Bank’s high standards across its supply chain. It includes a dedicated section about business ethics, covering anti-corruption, bribery, confidentiality, and the Bank’s right to audit.

Please click here for
Anti-Bribery and Corruption Policy Statement

The Bank has established clear procedures for handling breaches of its ABC Policy:

- **Immediate reporting:** Employees must report any suspected or actual breach through designated internal channels (including whistleblowing channels), while ensuring confidentiality and protection against retaliation
- **Investigation protocol:** Reported breaches are promptly investigated following documented protocols to ensure impartiality and evidence integrity
- **Escalation and governance:** Material breaches are escalated to senior management and the Board Audit Committee. Where required, UAE supervisory authorities are notified in compliance with legal obligations
- **Corrective actions:** Outcomes may include disciplinary measures, process enhancements, and mandatory re-training

In 2025, ADCB conducted face-to-face ABC training sessions for staff and circulated regular awareness communications to reinforce ethical standards and compliance obligations.

> ADCB maintains a zero-tolerance approach to bribery and corruption. The Bank’s ABC Policy prohibits facilitation payments, political contributions and any behaviour that could constitute or enable bribery and corruption



SPOTLIGHT

Assessing bribery and corruption risks

ADCB conducted an ABC risk assessment for ADCB UAE in December 2025 to evaluate bribery and corruption risks and the corresponding controls in order to determine the residual risks posed to the Bank. The methodology assessed:

- The potential liability created by intermediaries and other third-party providers
- Bribery and corruption risks associated with countries and industries in which ADCB operates
- Transactions involving state-owned or state-controlled entities and/or public officials
- Bribery and corruption risks associated with gifts and business hospitality, charitable donations, sponsorships, and political contributions
- Potential bribery and corruption risks posed through the hiring of candidates, and through the acceptance of trainees or interns referred by public officials, customers or vendors

Insights from the ABC risk assessment are used to define key risk indicators, which are reviewed and endorsed by the Board Risk Committee. The ABC risk assessment is fully integrated into the Bank’s enterprise risk management approach, recognising financial crime, bribery and corruption as material risks with potential regulatory and reputational impacts.

Tax transparency

Why it matters

ADCB Group adheres to the highest standards of corporate behaviour and values, including its approach to taxation. As regulators around the world increase their scrutiny and enhance their requirements for tax transparency, it is vital that ADCB Group maintains its reputation as a transparent, ethical and trustworthy institution, helping to reduce both financial and reputational risks.

ADCB's approach and progress

The Bank complies with all applicable tax laws, rules and regulations, without exception. ADCB does not enter into artificial arrangements to minimise or avoid taxation.

ADCB maintains its transparent approach to tax by ensuring it has a strong tax governance framework, risk management process, and controls in place to manage tax risk.

MSCI ESG tax transparency score[1]

10/10 MSCI

Governance

ADCB's Tax Control Framework is an important means of managing our tax affairs. The Tax Control Framework outlines all tax policies and procedures across the Group. The Tax Control Framework also comprises all processes and controls for each tax obligation, with continuous monitoring and review to ensure they are fit for purpose.

ADCB's Tax Control Framework

1. ADCB Group Tax Policy

The Tax Policy applies to the entire Group, including all executive and non-executive directors, employees, contractors and consultants. It applies to all worldwide taxes, including indirect taxes, such as VAT, and direct taxes, such as corporate tax and withholding tax.

ADCB's approach to tax risk management is founded on the following key principles:

1) ADCB will be in full compliance with the tax laws
2) ADCB will maintain a robust Tax Control Framework
3) ADCB will not engage in unacceptable tax planning
4) ADCB will use the arm's length tax transfer pricing principles to set transactions between related parties
5) ADCB will maintain a constructive working relationship with tax authorities

2. ADCB Group tax standard operating procedures

ADCB's tax standard operating procedures support the Group Tax Policy. The tax standard operating procedures provide additional detail on the various processes and actions required to enable compliance with the key principles outlined in the Tax Policy.

In addition, the tax standard operating procedures set out the roles and responsibilities of the various business units across ADCB Group to assist in managing tax risk across the Bank.

3. ADCB Group tax procedures

The ADCB Group tax procedures consist of a number of independent procedures which assist in complying with the key principles outlined in the ADCB Group Tax Policy. These include:

- Tax Transfer Pricing Procedure
- Tax Regulatory Change Procedure
- Tax Advice Procedure
- Tax Compliance Procedures, consisting of:
  - Tax Obligation Process Maps
  - Tax Obligation Procedures and Controls
  - RACI[2] matrix per tax obligation
- Internal Review Process

4. ADCB Group Tax Team procedures

There are several tax procedures that support the Group Tax Team in adhering to the key principles of the ADCB Group Tax Policy.

These include:

- Tax Position Paper Procedure
- Peer Review Procedure
- Knowledge and Records Management
- Tax Authority Engagement Procedure
- External Tax Advisor Engagement Procedure
- ADCB Group Board Engagement Procedure
- ADCB Management Engagement Procedure
- Tax Training Procedures

(1) As at October 2025
(2) RACI stands for responsible, accountable, consulted and informed

Key principles of the Group Tax Policy

Central to ADCB's Tax Control Framework is the Group wide Tax Policy. The Tax Policy applies to all functions of ADCB including employees, contractors and agents. For the purpose of the Tax Policy, tax risk is defined as an unexpected adverse financial or reputational consequence arising from adopting a position or taking an action that is inconsistent with the key tax principles detailed below.

1. Full compliance with tax laws

ADCB seeks to be fully compliant with tax obligations in all the jurisdictions in which it operates by providing tax authorities with complete, accurate and timely information as set out in legislation or as agreed with tax authorities. ADCB will not adopt a tax position that is contrary to tax laws or administrative practices of the relevant jurisdictions.

The Bank continuously monitors the potential effects of new legislation, judicial pronouncements and administrative practices in assessing the impact on its operations and transactions.

Day-to-day management of each subsidiary's tax obligations is delegated to the Executive Head of Tax. The Group Tax Department is centralised and works directly with internal stakeholders to identify, assess, monitor and avoid or mitigate any tax risk, submit tax returns to tax authorities in a timely manner and to report the correct tax liabilities and entitlements.

The Group Tax Department also ensures material risks are reported to senior management. This includes an overview of the potential tax liabilities and advice on how to mitigate and control these tax risks.

2. Maintenance of a robust Tax Control Framework

ADCB exercises strong governance over its tax affairs and maintains a robust Tax Control Framework, which is subject to regular testing and assurance.

Tax risk is managed in the context of ADCB Group's framework on risk management accountabilities. The Bank enforces strict protocols to control the type of transactions that it engages in and the tax risks associated with these transactions.

3. Tax planning

As part of the prudent management and organisation of its affairs, the Bank does not engage in transactions that are not in accordance with, or in line with the spirit of, the applicable tax legislation and regulations.

> ADCB does not tolerate tax evasion and will take appropriate action against any employee who is found to have facilitated tax evasion. The Bank does not provide any tax advice to third-parties and does not promote tax avoidance to its customers.

Furthermore, ADCB does not:

- Transfer value to operations in low tax jurisdictions to obtain a tax benefit or without genuine commercial reasons and substance
- Participate in, or promote, complex arrangements or tax structures that could be considered aggressive or viewed as contrived or serve no other genuine economic or business purpose
- Use structures, including those situated in tax havens or jurisdictions that are uncooperative with tax authorities, that are designed to obtain a tax benefit or avoid disclosures of activities
- Provide tax advice or planning to customers or promote tax structures of any kind to its customers

ADCB has developed policies and procedures to detect and report on financial crimes, including tax evasion.

4. Use of arm's length tax transfer pricing principles

ADCB's guiding principle in all intra-Group transactions is that the dealings must be in accordance with the arm's length standard for transfer pricing.

ADCB will not participate in arrangements where transfer pricing outcomes are not consistent with value creation. ADCB will not use transfer pricing to artificially shift or accumulate profits in low tax jurisdictions. Tax havens are not used for tax avoidance purposes but only for legitimate Group funding and liquidity purposes.

The Bank does not use the secrecy rules of jurisdictions to hide assets or income and pays taxes where the underlying economic activity occurs.

The Bank seeks to comply with domestic transfer pricing rules in each of the regions in which it operates. These rules, while predominantly based on the Organisation for Economic Co-operation and Development (OECD) Guidelines, do differ by country, which can result in different requirements depending on the region.

To address this matter, the following principles apply:

- OECD Guidelines will form the basis of ADCB's approach to transfer pricing
- ADCB will apply the arm's length standard for its transfer pricing arrangements

Transfer pricing outcomes must be consistent with the functional activities undertaken, risks assumed, and assets utilised in each jurisdiction.

5. Maintaining a constructive working relationship with tax authorities

ADCB proactively works with tax authorities in each of the jurisdictions in which it operates to establish a constructive working relationship based on transparency, mutual trust, respect and cooperation.

The ADCB Group Tax Department is responsible for managing relationships with local tax authorities and external tax advisors in all jurisdictions. To this end, ADCB:

- Is fully transparent in disclosing and discussing significant uncertainties in relation to tax matters
- Provides all relevant information to tax authority questions and enquiries in a timely manner
- Works openly and collaboratively to resolve any tax issues
- Engages in a cooperative, supportive and professional manner

ADCB also proactively engages with local tax authorities to disclose any significant inaccuracies which may arise, via voluntary disclosure to the relevant tax authorities.

Tax Policy governance

ADCB's Tax Policy applies across the Group and is approved by the Board Risk Committee. The Board's role in tax matters is to provide oversight and monitor the Tax Policy and Tax Control Framework. This includes ensuring adequate tax risk management policies are in place.

Executive Management is responsible for ensuring the effective operation of ADCB's Tax Control Framework. The ADCB Group Chief Financial Officer (GCFO) bears the accountability of tax risk management. The GCFO delegates responsibility for tax risk management to the Executive Head of Tax.

The Executive Head of Tax provides regular risk reporting to the GCFO. The GCFO and the Executive Head of Tax also report to the Board on a semi-annual basis regarding key tax risks and metrics, and provide assurance to the Board around the continued effectiveness of the Tax Control Framework. The Group Chief Risk Officer is also consulted on relevant tax matters.

Tax Policy controls

The Executive Head of Tax is responsible for implementing robust internal controls, relevant policies and procedures, to ensure:

- The timely preparation, review and submission of tax returns and payment of taxes as they fall due globally
- Appropriate and periodic tax risk assessments are undertaken
- Compliant record keeping is maintained
- Changes in tax laws are updated into Group Tax policies, procedures and training

All tax compliance and advisory related work must be prepared by dedicated tax specialist staff with an appropriate level of experience and a technical understanding of local tax legislation.

There are a number of controls in place to ensure tax risk is managed across ADCB Group. The key controls include:

- A qualified, experienced and well-resourced in-house Tax Team to manage and oversee the day-to-day tax compliance and advisory affairs of the Group
- External tax advice is sought for material, uncertain or complex issues or transactions, to ensure accuracy in our tax reporting obligations
- Engagement with tax authorities to obtain tax private rulings on products and transactions
- Maintaining robust accounting systems and strong internal controls to support our tax compliance and reporting obligations
- ADCB Group Internal Audit performing periodic reviews of tax financials, processes and documentation



SPOTLIGHT

The UAE Corporate Tax

Commencing from 1 January 2024, the ADCB Group implemented the UAE corporate tax rules into its systems and process.

Further, the UAE Ministry of Finance enacted the Domestic Minimum Top-up Tax (DMTT), aligned with the Organisation for Economic Co-operation and Development's (OECD) Base Erosion and Profit Shifting (BEPS) Pillar Two framework and is effective in the UAE for financial years commencing on or after 1 January 2025.

Under the DMTT, the UAE corporate tax rate increases from 9% to 15% for multinational enterprises operating in the UAE with consolidated global revenues of EUR 750 million or more in at least two of the four financial years.

ADCB Group assessed the implications of the DMTT across all jurisdictions in which it operates. This assessment included a detailed evaluation of the Initial Phase of International Activity Exclusion (IAE), which if applicable, reduced the UAE tax rate from 15% back to 9%. Based on the assessment undertaken as at 31 December 2025, ADCB Group met the eligibility criteria for the IAE. Accordingly, the UAE corporate tax rate applicable for the year ending 31 December 2025 was 9%.

Please refer to the 'Data and assurance section' on page 120, for further information on ADCB's total corporate tax provision and payments during the 2025 financial year.

Income tax expense reconciliation

Below is a reconciliation of income tax expense for ADCB Group for the year ending 31 December 2025. ADCB Group's income tax expense reconciliation is disclosed in Note 34 of ADCB Group's Consolidated Financial Statements for the year ended 31 December 2025.

The income tax expense disclosed in ADCB's income statement does not represent ADCB's liability to the Federal Tax Authority (or relevant overseas revenue authority). Rather, income tax expense is calculated in accordance with International Financial Reporting Standards and represents the accounting profit multiplied by the prima facie corporate tax rate with subsequent adjustments for 'non-temporary' differences between accounting and tax. These adjustments take into account the difference between expense and income recognition criteria under accounting principles and the UAE Corporate Tax legislation. Some examples include non-deductible expenses, exempt income and foreign tax rate differences for income derived overseas.

Income tax expense reconciliation (AED '000)	2022	2023	2024	2025
Profit before tax	6,668,609	8,426,714	10,585,380	12,843,631
Prima facie tax expense at 9% (2023 and 2022: 0%)	-	-	952,684	1,155,927
Tax effect of difference				
Tax effect of exempt income/loss	-	-	1,191	(5,909)
Tax effect of non-deductible expenses	-	-	5,307	10,648
Tax effect of different tax rates of overseas operations	133,606	143,599	133,459	147,571
Changes in deferred tax	-	-	42,845	4,848
Unrecoverable withholding tax	1,467	77,050	30,992	87,743
Others	-	-	(351)	(2,550)
Income tax expense	**135,073**	**220,649**	**1,166,127**	**1,398,278**

Effective tax rate

The tax rate applicable in the UAE is 9% for taxable profits exceeding AED 375,000. The Effective Tax Rate (ETR) for the year ending 31 December 2025 across the ADCB Group was 10.88% (2024: 11.02%).

The ETR is the income tax expense as a percentage of statutory profit before income tax. ADCB's ETR for the years 2022 to 2025 is shown below. ADCB's statutory ETR differs from the UAE Corporate Tax rate of 9% principally due to differing corporate tax rates in offshore locations where ADCB operates.

Effective tax rate (AED '000)	2022	2023	2024	2025
Profit before income tax	6,668,609	8,426,714	10,585,380	12,843,631
Income tax expense	135,073	220,649	1,166,127	1,398,278
Effective tax rate	**2.03%**	**2.62%**	**11.02%**	**10.88%**

Data and assurance

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03

ADCB ESG KPIs

Scope of reporting

The KPIs included cover our activities undertaken during the 2025 fiscal year (1 January – 31 December 2025), along with historical data on the previous fiscal years (2022–2024), subject to the availability of data. The data presented in this section covers Abu Dhabi Commercial Bank PJSC (referred to as 'ADCB Group'), its subsidiaries, branches within and outside of the UAE, unless stated otherwise.

The entities covered include the following:

- Abu Dhabi Commercial Bank, UAE (ADCB UAE)
- Al Hilal Bank PJSC, UAE (AHB UAE)
- ADCB Islamic Bank JSC (ADCB Kazakhstan)
- Abu Dhabi Commercial Bank – Egypt SAE (ADCB Egypt)
- ADCB Securities LLC (ADCB Securities)
- ADCB Asset Management Limited (ADCB Asset Management)
- ITMAM Services LLC and ITMAM Services FZ LLC (ITMAM)
- Abu Dhabi Commercial Engineering Services LLC (ADCE)

Restatements of prior reporting

The measurement and reporting of ESG metrics involves a degree of variability in the data due to changes in the data collection process and calculation methodologies. We have highlighted instances of restatements of prior year data, as footnotes to the disclosures.

Basis of reporting for GHG metrics (operational emissions)

Our reporting methodology for the GHG emissions reported for 2025 (1 January – 31 December 2025) along with historical data on the previous years (2022–2024) is aligned with the guidance in The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard[1].

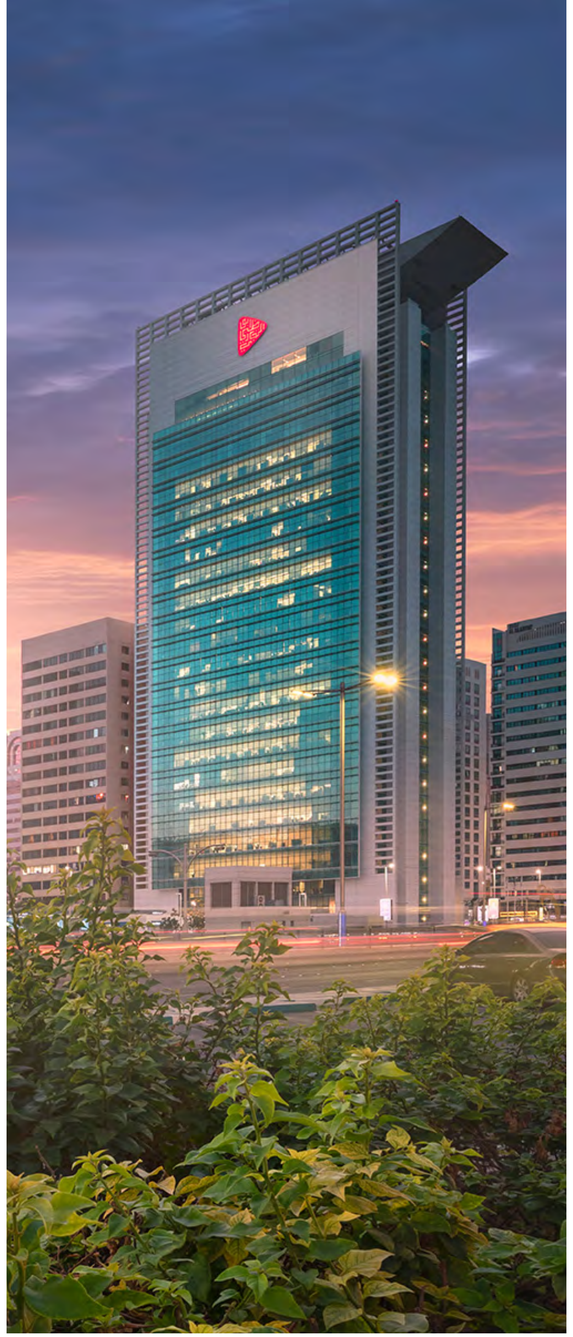
We report GHG emissions in tonnes of carbon dioxide equivalent (tCO_2e), a universal unit of measurement to indicate the global warming potential (GWP) of each of the six greenhouse gases, expressed in terms of the GWP of one unit of carbon dioxide.

Organisational boundary

For 2025, the Bank's reporting covers ADCB Group including all our subsidiaries operating in the UAE, Egypt and Kazakhstan.

Reporting boundary

The Bank reports emissions arising from activities for which we are responsible. The operational GHG reporting excludes emissions from employee commute, and third-party sources other than suppliers managing our data centres.



(1) https://ghgprotocol.org/corporate-standard

Scope 1 GHG emissions

Perimeter

Emissions from company-owned vehicles used for business and from the use of backup generators by the Bank.

Method

Fuel consumption by Bank's own vehicles

Fuel consumption (in litres) recorded as per the invoices paid to the supplier is converted to CO_2e using the emission factors from the GHG Conversion Factors for Company Reporting (2025)[1] by the UK's Department for Environment, Food and Rural Affairs (DEFRA).

Diesel consumption by Bank's power backup generators

Our backup generators are currently used for monthly performance and load testing as part of generator maintenance activities. The volume of diesel consumed (in litres) is an estimated value and converted to CO_2e using emission factors from the GHG Conversion Factors for Company Reporting (2025)[1] by the UK's Department for Environment, Food and Rural Affairs (DEFRA).

Natural gas consumption – ADCB Egypt

Fuel consumption (in m^3) recorded as per the invoices paid to the supplier is converted to CO_2e using the emission factors from the GHG Conversion Factors for Company Reporting (2025)[1] by the UK's Department for Environment, Food and Rural Affairs (DEFRA).

Scope 2 GHG emissions

Perimeter

Emissions from electricity consumed by the Bank at the premises it operates from. Our reporting comprises emissions generated from the use of electricity in the Bank's owned or rented properties where we hold the supply contract directly with the local utility providers in the UAE, Egypt and Kazakhstan. We have also included electricity usage from the Head Office building of AHB UAE, although the Bank do not hold the supply contract directly with local utility provider. This excludes properties owned by the Bank but leased to third parties.

Method

Electricity consumption was recorded using billed invoices (in kWh) from the utility provider. For the UAE, separate grid emission factors were used for Abu Dhabi and all other Emirates.

For Abu Dhabi, we used emission factors from Emirates Water and Electricity Company (EWEC)[2]. For all other Emirates, emission factors from Dubai Electricity and Water Authority (DEWA)[3] was used to calculate emissions from the electricity consumed, as per the GHG Protocol's location-based reporting guidance.

For Kazakhstan and Egypt, location specific grid emission factors were used as per the 'IFI Default Grid Emission Factors' (2021)[4] by the United Nations Framework Convention on Climate Change (UNFCCC).

For 6 branches in Egypt where there is no supply contract with the electricity provider, we have estimated our consumption using invoice payments from our expense systems. In addition, for 4 branches where electricity consumption (in kWh) was unavailable for either November or December, we have estimated the missing consumption using the same period consumption from the previous year for the respective branches.

(1) https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025
(2) https://www.ewec.ae/media-kit/statistical-reports
(3) https://dewa.gov.ae/en/consumer/sustainability/sustainability-reports?trk=public_post_comment-text
(4) https://unfccc.int/sites/default/files/resource/Harmonized_IFI_Default_Grid_Factors_2021_v3.2_0.xlsx

Scope 3 GHG emissions (operational)

Perimeter

Emissions from the following sources have been include;

- Emissions from the use of electricity in Bank's owned properties leased to third parties (for facilities where we hold the supply contract directly with the local utility providers in the UAE and Kazakhstan. ADCB Egypt does not have property leased to third parties)
- Emissions from the use of electricity by suppliers or vendors providing shared services (ADCB primary data centre and AHB disaster recovery data centre)
- Business travel undertaken by our employees

Method

Properties leased to third parties – ADCB UAE and ADCB Islamic Bank JSC (ADCB Kazakhstan)

For facilities where we hold the supply contract directly with the utility provider, electricity consumption was recorded using billed invoices (in kWH).

For properties in Abu Dhabi, we used emission factors from Emirates Water and Electricity Company (EWEC)[1].

For all other Emirates, emission factors from Dubai Electricity and Water Authority (DEWA)[2] was used to calculate emissions from the electricity consumed, as per the GHG Protocol's location-based reporting guidance. For Kazakhstan, a location specific grid emission factor was used as per the UNFCCC's 'IFI Default Grid Emission Factors' (2021)[3].

ADCB UAE primary data centre (outsourced)

Total electricity consumption (covering rack load, lighting and cooling) estimated based on the rack load allocated to ADCB within the outsourced data centre.

AHB UAE disaster recovery data centre (outsourced)

Electricity consumption estimated based on the agreed IT infrastructure electric power usage as per the contract with the vendor, considering 24/7 annual operations. Grid emission factors from Dubai Electricity and Water Authority (DEWA)[2] was used to calculate emissions from the electricity consumed for our data centres listed above.

Employee business travel (road)

The distance travelled (in km) for business travel by privately-owned or hired vehicles was calculated from our expense systems which reimburses our employees on a cost per km travelled basis. The CO_2e from road travel was calculated using emission factors from the GHG Conversion Factors for Company Reporting (2025)[4] by the UK's Department for Environment, Food and Rural Affairs (DEFRA).

Employee business travel (air)

Flight details (based on origin of travel and destination, including stopovers and connections availed) for business air travel was obtained from our expense systems and the emissions calculated using the Carbon Emissions Calculator from the International Civil Aviation Organisation (ICAO)[5].

Basis of reporting for GHG metrics (financed emissions)

In addition to our operational GHG emissions, ADCB also discloses GHG emissions linked to our financing and investment activities, reported as Scope 3: Category 15 (financed emissions). To ensure a credible approach, we have adopted the methodology provided by the Partnership for Carbon Accounting Financials (PCAF)[6].

For further details on our basis of reporting for financed emissions, please refer to the Aligning portfolios and reducing financed emissions section.

Basis of reporting for Sustainable Finance

The sustainable finance disclosures in this report are aligned to ADCB's Sustainable Finance Framework which defines our approach and methodology for categorising, tracking, and reporting on the Bank's sustainable finance target.

(1) https://www.ewec.ae/media-kit/statistical-reports
(2) https://www.dewa.gov.ae/-/media/Files/Sustainability/DEWA_Sustainability_Report_2023_English.ashx
(3) https://unfccc.int/sites/default/files/resource/Harmonized_IFI_Default_Grid_Factors_2021_v3.2_0.xlsx
(4) https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025
(5) https://www.icao.int/environmental-protection/CarbonOffset/Pages/default.aspx
(6) https://ghgprotocol.org/sites/default/files/2023-03/The%20Global%20GHG%20Accounting%20and%20Reporting%20Standard%20for%20the%20Financial%20Industry.pdf

1. Strategic Priority: Climate

1.1. Sustainable Finance Portfolio

Sustainable finance portfolio category (AED bn)	Cumulative value of financing 2021-2025
Lending[1]	50.4
Investments[2]	12.1
Facilitation[3]	9.4
Total sustainable financing - assets	**71.9**

Total liabilities (AED bn)	As at 31 December 2025
Green bonds issued[5]	4.2
Sustainable deposits[6]	0.3
Total liabilities	**4.6**

Sustainable lending (AED mn)	Limit Booked, as at 31 December 2025
Green loans	31,393
Social loans	2,432
Sustainable loans	3,578
Sustainability-linked loans	12,948
Total lending	**50,351**

Sustainable investments (AED mn)	Total value invested as at 31 December 2025
Green bond/Sukuk	6,081
Social bond/Sukuk	2,364
Sustainability bond/Sukuk	3,633
Total investments	**12,079**

Eligible green loan portfolio breakdown – funded outstanding[9] – (AED mn)	2025[4]
Green buildings	7,072
Renewable energy	5,145
Solar	4,054
Green Hydrogen	432
Wind	659
Energy efficiency	0
Sustainable water and wastewater management	497
Pollution prevention and control	392
Total green lending	**13,106**

Facilitation – Value of credit facility/bond (AED mn)	2025[4]
Debt Capital Markets advisory[3]	7,890
Green bonds	2,599
Sustainability bonds	2,637
Green/sustainability sukuks	2,654
ESG and sustainable investments (through ADCB Asset management Limited)[3]	1,541
ESG focused impact investments	6
ESG focused thematic investments	124
ESG assessed investments	1,411
Total sustainable financing (facilitation)	**9,431**

1.2. Environmental and Social Risk Management

Exposure concentration in sectors with material E&S risks as per ADCB ESRM Policy[4][7][8]	2023	2024	2025
Restricted sectors	0.10%	0.01%	0.09%
High-risk sectors	12.20%	11.96%	17.50%

Integration of environment and social factors in corporate lending	2023	2024	2025
Credit counter parties assessed for E&S risk (number)	70	117	212

Portfolio exposure to economic sectors with material E&S risks (AED mn)[4][8]	As at 31 Dec 2025	Portfolio weight
Oil and Gas extraction	16,242	2.1%
Power - conventional	2,475	0.3%
Power - renewables	5,108	1.0%
Real estate investment	7,784	6.8%
Aviation	8,513	1.0%
Shipping	7,180	0.3%
Manufacturing	23,019	3.0%

Note: Figures may not add up due to rounding differences
The Sustainable Finance Portfolio disclosures have been verified by an independent third-party assurance provider
(1) For Corporate and Investment Banking Group (CIBG)/Private Banking Group (PBG) - Limit booked at execution of new facilities provided (and any incremental increase in limits in case of refinancing). For Retail Banking Group (RBG) – Total disbursals
(2) Total invested
(3) For CIBG: Apportioned value of ADCB's participation in the transaction. For Asset Management: Reported as Assets Under Management (AuM)
(4) The value of the portfolio as a total monetary value based on 'on-balance sheet' assets as at 31 December of the reported year
(5) Reported as total issued
(6) Includes deposits in Sustainable Call Accounts and escrow accounts for green buildings
(7) For further details please refer to ADCB's ESRM Policy
(8) Exposure concentration (%) and portfolio exposure (%) reported for ADCB UAE only.
Total lending to Oil and Gas extraction is AED 16.2 billion, representing 2.1% of ADCB UAE loans and advances
(9) As per ADCB Green Bond Framework 'use of proceeds'

1.3. Net Zero Operations

	ADCB Group[1]			
Energy consumption	**2022**	**2023**	**2024**	**2025**
Energy intensity (GJ/FTE)[2]	**25.70**	**24.15**	**24.86**	**22.24**
Total energy consumption (direct and indirect) (GJ)	**313,771**	**312,535**	**303,965**	**280,568**
Within the organisation				
Total energy consumption (Direct)(GJ)	**217,364**	**218,012**	**227,298**	**197,738**
Total electricity consumption (kWh)	57,514,169	57,680,404	58,397,397	49,879,542
Fuel consumption				
Total petrol consumption (litres)	163,033	164,638	154,871	143,277
Total diesel consumption (litres)	1,068	2,478	4,823	7,851
Natural gas consumption (m^3)	124,276	123,022	302,774	338,413
Outside the organisation[3]				
Total energy consumption (Indirect)(GJ)	**96,408**	**94,523**	**76,667**	**82,830**
Total electricity consumption (kWh)	**19,079,260**	**15,765,341**	**13,525,131**	**12,277,161**
Bank's properties leased to third parties	13,578,999	10,232,206	8,196,996	8,113,476
ADCB UAE primary data centre (outsourced)	4,732,000	4,763,000	4,558,000	3,546,000
AHB UAE disaster recovery data centre (outsourced)	768,261	770,135	770,135	617,685
Total fuel consumption for employee business travel by road (litres)	**827,290**	**1,127,037**	**834,856**	**1,045,080**

	ADCB Group[1]			
Greenhouse Gas (GHG) emissions	**2022**	**2023**	**2024**	**2025**
GHG emissions intensity (tCO_2e/FTE)[4]	**2.73**	**2.51**	**2.69**	**2.63**
Total GHG emissions (tCO_2e)	**26,868**	**25,217**	**26,496**	**25,528**
Scope 1 (tCO_2e)[5]	633	644	960	1,024
Scope 2 (tCO_2e)[5]	17,980	16,863	19,262	17,692
Scope 3 - operational (tCO_2e)[5]	8,254	7,710	6,274	6,812
Bank's properties leased to third parties	3,813	2,605	1,892	2,122
ADCB UAE primary data centre (outsourced)	2,031	1,922	1,814	1,434
AHB UAE disaster recovery data centre (outsourced)	330	311	306	250
Employee business travel (road)	1,926	2,649	1,740	2,162
Employee business travel (air)	153	223	522	843

Scope 3 financed emissions by sector[5]	**Exposure[6] (AED bn)**		**Absolute financed emissions (million tCO_2e)**		**Financed emissions intensity (tCO_2e/1,000 AED)**		**PCAF score[7]**	
ADCB UAE only	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**
Oil & Gas	10.4	12.4	8.40[8]	10.65	0.81[8]	0.86	2.4[8]	2.8
Commercial Real Estate (CRE)	60.2	53.6	1.91	1.20	0.03	0.02	4.4	4.3
Power	6.0	8.1	1.34	1.54	0.22	0.19	3.1	3.0
Aviation	4.4	5.2	1.07	0.98	0.24	0.19	4.8	4.7
Iron & steel	0.7	0.8	0.50	0.56	0.67	0.72	1.8	2.0
Road transport	0.7	1.0	0.21	0.35	0.29	0.35	3.5	3.9
Shipping	0.4	2.3	0.13	0.50	0.30	0.21	5.0	2.9
Residential Real Estate (RRE)	13.5	17.5	0.02	0.03	<0.01	<0.01	4.0	4.0
Total	**96.4**	**101.0**	**13.58[8]**	**15.81**	**0.14**	**0.16**	**4.0[8]**	**3.9**

Note: Figures may not add up due to rounding differences

(1) Our reporting boundary covers ADCB Group (including our subsidiaries in Egypt and Kazakhstan)
From 2024 onwards, the reporting boundary was expanded to include electricity and fuel consumption from branches in ADCB Egypt; therefore, the reported figures are not comparable with the prior year (2022-2023) figures

(2) Energy intensity covers electricity and fuel consumption within the organisation

(3) Total energy consumption outside the organisation is limited to electricity consumption by the Bank's properties leased to third parties, electricity consumption by outsourced data centres and fuel consumption from employees' business travel by road

(4) Our disclosure on GHG emissions intensity excludes Scope 3 emissions from properties leased to third parties

(5) The following disclosures have been verified by a third-party assurance provider: Scope 1 GHG emissions, Scope 2 GHG emissions, Scope 3 GHG emissions

(6) As at 31 December

(7) PCAF scores based on scope 1 and 2 emissions

(8) As part of the annual recalculation of its financed emissions baseline, ADCB has updated its 2023 Scope 3 (Category 15) financed emissions.
For more information, please refer to P: 30 of this report

1.3. Net Zero Operations (continued)

Water consumption	ADCB Group (excl. ADCB Egypt and ADCB Kazakhstan) 2022	2023	2024	2025
Water consumption within the organisation (Megalitres)	96.6	148.3	131.8	115.0
Water intensity (m^3/FTE)	13,540	19,327	17,153	15,718

Material waste generated	ADCB Group (excl. ADCB Egypt and ADCB Kazakhstan)[1] 2022	2023	2024	2025
Total waste generated and breakdown by composition (kg):	388,093	402,006	407,962	432,286
Paper	54,985	21,157	58,147	79,239[2]
Plastic	301	543	406	172
Cardboard	865	6,350	8,060	7,746
General waste (including food waste)	322,542	373,956	341,349	345,129
Total amount of waste disposed, broken down by disposal method (kg):				
Landfilling	322,542	373,956	341,349	345,129
Recycling	56,151	28,050	66,613	87,157
Waste Intensity (kg/FTE)	54.39	52.39	53.11	59.07

Electronic waste[3]	ADCB Group (excl. ADCB Egypt and ADCB Kazakhstan) 2024	2025
Total electronic waste generated (kg)	13,172	20,015
Total electronic waste recycled (kg)	13,172	20,015

Printed paper usage[4]	ADCB Group (excl. ADCB Egypt and ADCB Kazakhstan) 2024	2025
Total paper printed for office use (kg)	157,849	114,360

1.4. Green procurement and supply chain

Spent on local suppliers	2022	2023	2024[5]	2025[5]
Percentage of the procurement budget spent on local suppliers (%)	93%	96%	95%	96%

(1) Waste data reported covers select facilities in the UAE including head office buildings (ADCB UAE and AHB UAE) and our warehouse in Abu Dhabi
(2) The increase in paper waste generated was due to bulk shredding of confidential documents at the end of the retention period as per regulatory requirements in the UAE.
(3) In 2025, the Bank scrapped old IT equipment which led to the significant increase in electronic waste generated
(4) Print volumes have decreased, as most departments are using digital tools instead of printing papers
(5) For 2022 - 2023 reported for UAE operations (excluding ADCB Egypt and ADCB Kazakhstan). For 2024 onwards, reported for ADCB Group
(6) NPS scores recorded excludes subsidiaries
(7) Refers to Fast Feedback Loop (FFL) NPS Score

2. Strategic Priority: Customers and Communities

2.1. Customer satisfaction

Customer experience	2022	2023	2024	2025
NPS scores recorded by ADCB UAE[6][7]	69	73	77	80
Retail Banking NPS[7]	63	70	77	82
Private Banking NPS[8]	84	88	96	88
Corporate & Investment Banking NPS[7]	68	78	86	73
Treasury NPS[8]	91	91	84	89
NPS score recorded by AHB UAE[7]	50	42	46	45
NPS score recorded by ADCB Egypt[7]	N/A	42	60	71

Customer complaints	ADCB Group 2022	2023	2024	2025[9]
Total number of customer complaints recorded (#)	25,047	25,148	16,721	19,311
Total number of complaints recorded per 1,000 customers (#)	13	10	5	7

2.2. Financial inclusion

Accounts to unbanked or underbanked customers	ADCB UAE 2022	2023	2024	2025
Total number of no-cost retail checking accounts provided to previously unbanked or underbanked customers (#)[10]	185,886	280,000	329,783	253,763

(8) Refers to Strategic NPS Score
(9) Increase in number of customer complaints due to increase in customer complaints reflects heightened sensitivity to fees due to updated policies, product feature changes, requests for exceptions on restructuring liabilities, expectations around recovery of scam related losses, and perceived service pressures during periods of high demands rather than indicating a decline in service quality or control effectiveness.
(10) Includes the number of accounts for individuals through the digital onboarding app 'Hayyak' with a salary less than AED 5,000 per month in ADCB UAE

2.2. Financial inclusion (continued)

Financial literacy	2022	2023	2024	2025
Number of participants in financial literacy initiatives ('000)[1]	2,579	1,395	1,940	1,711

Loans to promote small business (microenterprise and SME)[2]	ADCB Group			
	2022	2023	2024	2025
Number of loans – Small Business (#)	13,082	16,115	13,564	12,038
Value of net loans – Small Business (AED mn)	3,411	3,431	4,010	4,939
Percentage of total lending to small business (%)[3]	1.32%	1.14%	1.14%	1.22%
Percentage of revenues from lending to small business (%)[4]	5%	6%	7%	7%

Digital transactions		ADCB UAE			
		2022	2023	2024	2025
Percentage of digital transactions (%)	Retail customers	96%	97%	97%	97%
	Corporate customers[5]	96%	97%	97%	97%
Total number of transactions by channel (# mn)					
Online transactions	Retail customers	10.5	8.1	8.0	6.7
Mobile transactions		86.3	118.5	202.8	236.3
SMS banking transactions		1.4	1.6	1.9	1.2
WhatsApp transactions		0.6	0.5	0.4	0.29
ATM transactions		36.9	38.7	48.2	45.6
Branch transactions		3.8	3.7	4.8	4.8

2.3. Digital and innovation

Digital channels for customer engagement	ADCB Group			
	2022	2023	2024	2025
Number of internet banking subscribers (#)	678,177	762,224	785,381	792,017
Number of mobile banking app subscribers (#)	1,382,360	1,993,025	2,829,234	2,501,040

2.4. Community investments

Direct community investments	ADCB Group			
	2022	2023	2024	2025
Total direct community investments (AED '000)	3,993	10,273	13,248	16,882
Donations (AED '000)	2,056	1,683	3,004	906
Sponsorships (AED '000)	1,937	8,590	10,244	15,976
Community investments as a percentage of revenues (%)	0.03%	0.06%	0.07%	0.08%

(1) Reported based on email open rates for 2022. From 2023 onwards, we have reported the unique number of participants
(2) Small business: Reported for clients in the Commercial Banking segment
(3) Percentage of total book as at 31 December of the respective reporting year
(4) Reported as percentage of net interest income
(5) Transactions through ProCash

3. Strategic Priority: Employees

3.1. Employee engagement and wellbeing

Employees breakdown by contract	ADCB Group 2022	2023	2024	2025
Total number of employees	**8,460**	**9,031**	**9,158**	**8,905**
Full-time employees (#)[1]	8,459	9,026	9,142	8,890
Part-time employees (#)	0	0	0	0
Contractors/consultants (#)	1	5	16	15
Workers who are not employees and whose work is controlled by the organization (#)[2]	900	1,208	1,332	1,158

Full time employees breakdown by gender	ADCB Group 2022	2023	2024	2025
Male (#)	4,881	5,136	5,106	4,954
Female (#)	3,578	3,890	4,036	3,936
Percentage of female employees (%)	**42%**	**43%**	**44%**	**44%**

New employee hires		ADCB Group 2022	2023	2024	2025
Total new hires (#)		1,316	1,400	1,219	989
New hires by age (#)	*Under 25 years*	198	171	143	164
	25–34 years	646	766	654	431
	35–45 years	401	387	353	323
	Over 45 years	71	76	69	71
New hires by gender (#)	*Male*	748	791	647	552
	Female	568	609	572	437
New hires by nationality: Emirati nationals (#)[3]	*Male*	82	92	65	57
	Female	170	224	189	181
New hires by nationality: Local employees (#)[4]	*Male*	251	259	265	233
	Female	286	313	319	301

(1) Includes temporary employees on a full time basis. Total full time employees disclosed includes temporary employees who are replacements for employees on maternity leave in ADCB Kazakhstan, as maternity leave in Kazakhstan is 3 years for each child and can be extended
(2) These workers include outsourced staff with yearly contract deployed on the following: direct sales of loans and credit cards, collections, sales support (Coordination and MIS) and operational activities (credit administration, MIS, marketing, document verification, property officers, maintenance officers)
(3) Includes full-time employees and contractors/consultants
(4) Local employees are the nationals (citizens) employed within our respective group locations in UAE, Egypt and Kazakhstan

3.1. Employee engagement and wellbeing (continued)

Employee turnover		ADCB Group 2022 Number	2022 Percentage	2023 Number	2023 Percentage	2024 Number	2024 Percentage	2025 Number	2025 Percentage
Total employee turnover (voluntary and involuntary)		**821**	**10%**	**861**	**10%**	**1,008**	**11%**	**1,296**	**15%**
Employee turnover (voluntary and involuntary) breakdown:									
Turnover by age	*Under 25 years*	35	12%	34	12%	53	21%	43	18%
	25–34 years	345	13%	324	11%	396	13%	501	18%
	35–45 years	339	9%	340	9%	402	10%	495	12%
	Over 45 years	102	6%	163	9%	157	9%	257	14%
Turnover by gender	*Male*	492	10%	563	11%	595	12%	721	15%
	Female	329	9%	298	8%	413	10%	575	15%
Turnover by nationality	*Emirati nationals*	171	9%	135	6%	231	11%	339	17%
	Local employees[1]	347	11%	349	10%	462	13%	521	14%

Employee engagement	ADCB UAE and its subsidiaries in the UAE (excl. AHB UAE) 2022	2023	2024	2025
Organisational Health Index (OHI) survey score	80	79	81	78
Employee response rate (%)	88%	96%	94%	95%

3.2. Emiratisation

Emiratisation level		ADCB Group (excl. ADCB Egypt and ADCB Kazakhstan) 2022	2023	2024	2025
UAE national employees (#)		**1,910**	**2,096**	**2,107**	**2,054**
Emiratisation rate (%)[2][3]		38%	40%	39%	39%
UAE national employees by gender	*Male (#)*	410	454	436	412
	Female (#)	1,500	1,642	1,671	1,642

Local employment[1]		ADCB Group 2022	2023	2024	2025
Number of local employees (#)		3,229	3,444	3,562	3,621
Local employees in workforce (%)		38%	38%	39%	41%
Local Employees in Senior Management (%)		32%	32%	32%	35%
Local employees by gender	*Male (#)*	1,265	1,336	1,368	1,399
	Female (#)	1,964	2,108	2,194	2,222

(1) Local employees are the nationals (citizens) employed within our respective group locations in UAE, Egypt and Kazakhstan
(2) As percentage of total ADCB UAE and its subsidiaries in the UAE excluding non-financial entities such as ITMAM, ADCE and outsourced employees. Emiratisation rate is calculated as the percentage of Emirati nationals (with a family book) within the total full time employees in ADCB UAE and AHB UAE
(3) For 2022-2023, this disclosure was verified by a third-party assurance provider

3.3 Learning and development

		ADCB Group							
		2022		2023		2024		2025	
Training hours (breakdown)		Total training hours	Average hours per employee	Total training hours	Average hours per employee	Total training hours	Average hours per employee	Total training hours	Average hours per employee
Total training hours (#)		**381,516**	**45**	**391,133**	**43**	**381,245**	**42**	**427,665**	**48**
By gender	*Male*	164,544	34	184,166	36	195,425	38	210,059	42
	Female	216,972	61	206,968	53	185,820	46	217,606	55
By employee category	*Senior and Executive Management*	2,665	15	4,925	23	4,145	19	7,018	29
	Middle management	59,198	28	85,379	34	92,947	35	122,098	44
	Non-management	319,653	52	300,830	48	284,152	45	298,549	51
For Nationals	*UAE nationals*	182,284	95	182,126	87	118,211	56	140,379	68
	Local employees[1]	244,979	76	257,431	75	225,231	63	269,446	74

	ADCB Group			
eLearning hours for staff	**2022**	**2023**	**2024**	**2025**
Total eLearning hours provided for all staff (number)	128,879	120,047	143,997	188,999

	ADCB Group			
Training expenditure	**2022**	**2023**	**2024**	**2025**
Total training expenditure (AED '000)	23,986	22,148	25,256	28,368
Training expenditure per employee (AED '000/FTE)	2.84	2.45	2.76	3.19

		ADCB Group			
Performance reviews[2]		**2022**	**2023**	**2024**	**2025**
Full-time employees who received a regular performance and career development review during the reporting period (%)		100%	100%	100%	100%
By employee category (%)	*Senior and Executive Management*	100%	100%	100%	100%
	Middle management	100%	100%	100%	100%
	Non-management	100%	100%	100%	100%
By gender (%)	*Male*	100%	100%	100%	100%
	Female	100%	100%	100%	100%

(1) Local employees are the nationals (citizens) employed within our respective group locations in UAE, Egypt and Kazakhstan
(2) Reported for employees eligible for a performance and career development review

3.4. Equality, diversity and inclusion

Employee diversity		ADCB Group 2022	2023	2024	2025
Employees by age (%)	*Under 25 years*	4%	3%	3%	3%
	25-34 years	32%	34%	33%	32%
	35-45 years	44%	43%	45%	45%
	Over 45 years	20%	20%	19%	21%
Employee by gender (%)	*Male*	58%	57%	56%	56%
	Female	42%	43%	44%	44%
Employee by category and gender: Entry and mid-level positions (%)	*Male*	57%	56%	55%	55%
	Female	43%	44%	45%	45%
Employee by category and gender: Senior and executive level (%)	*Male*	86%	85%	83%	82%
	Female	14%	15%	17%	18%

Gender pay ratio (median male to median female salary)[4]	ADCB Group (excl. ADCB Egypt and ADCB Kazakhstan) 2022	2023	2024	2025
Overall (ratio)	0.98	0.94	0.97	0.97
Senior and Executive Management	1.00	1.06	1.02	0.99
Middle management	1.03	0.97	0.95	0.99
Non-management	0.72	0.77	0.75	0.74

Wages and benefits	ADCB Group 2022	2023	2024	2025
Total salaries and benefits paid to employees (AED '000)	2,767,876	3,064,387	3,359,714	3,543,118

Parental leave	ADCB Group 2022	2023	2024[1]	2025
Female employees that took maternity leave (#)	193	213	200	178
Female employees who returned to work after maternity leave ended (#)	190	212	198	172
Female employees returned from maternity leave who were still employed twelve months after returning to work (retention) (#)	170	181	207	193
Return to work rate (%)[2]	98.4%	99.5%	99.0%	97.0%
Retention rate (%)[3]	90.5%	95.3%	98.0%	97.0%

Employee nationalities	ADCB Group 2022	2023	2024	2025
Total number of employee nationalities (#)	81	84	83	84

People of determination	ADCB Group 2022	2023	2024	2025
Total number of people of determination employed (#)	17	18	19	57

(1) We have restated 2024 data due to improvements in our reporting approach
(2) Female employees who returned to work after parental leave ended
(3) Female employees who returned from parental leave and were still employed twelve months after returning to work
(4) This disclosure was verified by a third-party assurance provider for the data reported for 2022-2023. Reported for ADCB UAE and all its subsidiaries in the UAE, excluding outsourced employees. Gender pay ratio is calculated as the ratio of median male to median female gross salary. Salary is considered as the monthly total pay in AED (including fixed pay, social allowance, job-based allowances as applicable) as calculated for the month of December

4. Strategic Priority: Governance

4.1. Corporate governance, compliance and code of conduct

	ADCB Group			
Composition of the Board of Directors	**2022**	**2023**	**2024**	**2025**
Total number of Board of Directors (#)	11	11	11	11
Total number of independent Board members (#)	10	10	9	8
Total number of executive members of the Board (#)	0	0	0	0
Percentage of independent board members (%)	91%	91%	82%	73%
Board composition by gender (%)				
Male	82%	82%	82%	82%
Female	18%	18%	18%	18%
Board composition by age group (%)				
Less than 25 years	0%	0%	0%	0%
25-34 years	18%	18%	18%	9%
35-45 years	36%	27%	27%	36%
Above 45 years	46%	55%	55%	55%

	ADCB Group			
Monetary losses as a result of non-ethical business practices	**2022**	**2023**	**2024**	**2025**
Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations (AED)	0	0	0	0

	ADCB UAE			
Whistleblowing cases	**2022**	**2023**	**2024**	**2025**
Total number of whistleblowing cases filed in the reporting period (#)	121	131	183	152
Total number of whistleblowing cases addressed or resolved in the reporting period (#)	121	131	183	152
Percentage of whistleblowing cases that were substantiated (%)	17%	15%	13%	11%

4.2. Risk management and cybersecurity

	ADCB UAE	
Data security breaches	**2024**	**2025**
Number of data security breaches (number)[1]	0	0

	ADCB Group (excluding ADCB Egypt and ADCB Kazakhstan)			
Training on data privacy and protection	**2022**	**2023**	**2024**	**2025**
Percentage of employees formally trained on data privacy and protection (%)	97%	94%	97%	96%

	ADCB Group	
Card-related fraud	**2024**	**2025**
Amount of fraudulent transaction activity (total value of account holder transactions refunded to account holders due to fraud) (AED)[2][3]	16,825,325	12,212,192
Percentage of activity from card-not-present fraud *(relates to online/e-commerce card transactions)* (%)[4]	95%	99%
Percentage of activity from card-present and other fraud *(relates to in-store card transactions)* (%)[5]	5%	1%

(1) Data security breaches are defined as confirmed incidents where customer data was accessed, exposed and exploited through unauthorised access to our information systems, resulting in a compromise of confidentiality, integrity or availability
(2) Card-related fraud linked to customer usage at third-party merchants
(3) ADCB incurred a net loss of AED 0.7 million in 2024 and AED 0.02 million in 2025, through card-related fraud
(4) Card-related fraud for a transaction in a non-face-to-face setting with a merchant (conducted online)
(5) Card-related fraud for a transaction in a face-to-face setting with a merchant

4.3. Financial crime, anti-bribery and corruption

	ADCB Group			
Legal cases regarding corruption	**2022**	**2023**	**2024**	**2025**
Number of public legal cases regarding corruption brought against the organisation or its employees during the reporting period (#)	0	0	0	0

	ADCB Group			
Employee acknowledgement on Code of Conduct	**2022**	**2023**	**2024**	**2025**
Percentage of workforce who have formally acknowledged compliance with the Employee Code of Conduct (%)	100%	100%	100%	100%

	ADCB Group			
Employee training on anti-corruption[1]	**2022**	**2023**	**2024**	**2025**
Percentage of workforce formally trained on the anti-corruption/bribery policy (%)	100%	100%	100%	100%

	ADCB Group			
Communication on anti-corruption policy to the Board	**2022**	**2023**	**2024**	**2025**
Percentage of Board of Directors that the organisation's anti-corruption policies and procedures have been communicated to (%)	100%	100%	100%	100%

	ADCB Group (excl. ADCB Egypt and ADCB Kazakhstan)			
Anti-corruption policies and procedures in the supply chain	**2022**	**2023**	**2024**	**2025**
Percentage of business partners that the organisation's anti-corruption policies and procedures have been communicated to (%)	100%	100%	100%	100%

(1) Reported as Code of Conduct training for all employees (incorporating anti-bribery and corruption principles) and targeted ABC training for new hires as part of induction program

4.4. Tax transparency

	ADCB Group			
Tax disclosures	**2022**	**2023**	**2024**	**2025**
Corporate income tax paid on cash basis split by jurisdiction				
Total income tax expense (AED mn)	**77.58**	**119.06**	**133.84**	**1,175.13**
UAE	-	-	-	914.25
Kazakhstan	7.8	10.4	9.40	12.49
Egypt	68.6	112.1	100.37	195.12
Others[1]	1.2	(3.44)	24.07	53.28
Corporate income tax accrued on profit/loss per jurisdiction				
Total income tax expense (AED mn)	**135.07**	**220.65**	**1,166.13**	**1,398.28**
UAE	-	-	956.40	1,080.65
Kazakhstan	7.38	11.02	7.80	12.06
Egypt	127.69	133.62	173.12	193.18
Others[1]	-	76.01	28.80	112.38

Notes on ADCB Group's tax disclosures

- **UAE:** Corporate Tax in the UAE was not applicable during financial year ending 31 December 2023, and previous reporting years. The UAE Corporate Tax applied to the ADCB Group from 1 January 2024
- **Kazakhstan:** ADCB Group has operations in Kazakhstan. To this end, corporate tax and other taxes are payable to the Kazakhstan tax authorities
- **Egypt:** ADCB Group has operations in Egypt. To this end, corporate tax and other taxes are payable to the Egyptian tax authorities

Note: For further information, please refer to the ADCB Consolidated financial statements for the year ended December 31, 2025.
Figures may not add up due to rounding differences
(1) Withholding tax expense in international jurisdictions

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	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	71

GRI Standard	Indicator and disclosure	Disclosure/reference to report page numbers
GRI 403: Occupational health and safety 2018 (Topic-specific disclosure)	403-8 Workers covered by an occupational health and safety management system	71 (see ref. 9)
	403-9 Work-related injuries	71
	403-10 Work-related ill health	71
Emiratisation		
GRI 3: Material Topics 2021	3-3 Management of material topics	73–74
GRI 202: Market presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	(see ref. 10)
	202-2 Proportion of senior management hired from the local community	73
Learning and development		
GRI 3: Material Topics 2021	3-3 Management of material topics	75–76
GRI 404: Training and education 2016	404-1 Average hours of training per year per employee	116
	404-2 Programs for upgrading employee skills and transition assistance programs	74–75
	404-3 Percentage of employees receiving regular performance and career development reviews	116
Equality, diversity and inclusion		
GRI 3: Material Topics 2021	3-3 Management of material topics	77–78
GRI 405: Diversity and equal opportunity 2016	405-1 Diversity of Governance bodies and employees	117
	405-2 Ratio of basic salary and remuneration of women to men	117

GRI Standard	Indicator and disclosure	Disclosure/reference to report page numbers
Governance topics		
Corporate governance, compliance and Code of Conduct		
GRI 3: Material Topics 2021	3-3 Management of material topics	80–91
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	119
Non GRI Topic-Specific Disclosures	Total number of Board of Directors	118
	Total number of independent Board members	118
	Total number of executive members of the Board	118
	Composition of the Board of Directors broken down by gender and age	118
	Total hours of training for Board members	118
	Total number of whistleblowing cases (filed, addressed or resolved) in the reporting period	118
	Percentage of whistleblowing cases that were substantiated	118
Risk management and cybersecurity		
GRI 3: Material Topics 2021	3-3 Management of material topics	92–98
GRI 418: Customer privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	(see ref. 3)
Non GRI Topic-Specific Disclosures	% of employees formally trained on Data Protection & Privacy	118
	Amount of fraudulent transaction activity (total value of account holder transactions refunded to account holders due to fraud)	118
	Number of data security breaches	118
Financial crime, anti-bribery and corruption		
GRI 3: Material Topics 2021	3-3 Management of material topics	99–101
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	101
	205-2 Communication and training about anti-corruption policies and procedures	119
	205-3 Confirmed incidents of corruption and actions taken	(see ref. 11)

GRI Standard	Indicator and disclosure	Disclosure/reference to report page numbers
Tax transparency		
GRI 3: Material Topics 2021	3-3 Management of material topics	102–105
GRI 207: Tax 2019 (Management approach disclosures)	207-1 Approach to tax	102–105
	207-2 Tax governance, control, and risk management	102–105
	207-3 Stakeholder engagement and management of concerns related to tax	102–105
GRI 207: Tax 2019 (Topic specific disclosure)	207-4 Country-by-country reporting	120

GRI references

Ref #	Description
1	Our suppliers consist of third-party service providers, contractors, logistics providers, and others. Many of our suppliers are local to our areas of operations and include small and medium enterprises
2	For further details, please refer to 2025 ADCB Annual Report
3	Not reported due to confidentiality constraints
4	Collective bargaining is prohibited as per UAE law and therefore not reported for ADCB Group
5	As a bank, ADCB is committed to supporting our customers in their transition to a low carbon economy through our financing. Please refer to the 2025 ADCB Green Bond Report for further details of our impacts through financing
6	All water that is used by ADCB is discharged back through the local sewerage services companies
7	Information unavailable as data is currently not monitored. We will continue to enhance our data collection and reporting methodology in the future
8	ADCB supports the development of the community through infrastructure projects that we finance
9	ADCB's Health & Safety policy covers all full time employees
10	Our HR practices comply with the requirements of the UAE Labour Law which promotes equal pay for female employees undertaking the same work as their male colleagues
11	ADCB has zero tolerance towards bribery and corruption. We adhere to the reporting requirements as mandated by the Central Bank of the UAE
12	No financially material incidents of non-compliance with laws and regulations in 2025

SASB content index

SASB content index – 2025

SASB topic	SASB sub-topic	Accounting metric	Code	ADCB material topic	Reference to report page number
Commercial Banks	Data Security	Number of data security breaches	FN-CB-230a.1		118
		Description of approach to identifying and addressing data security risks	FN-CB-230a.2	Risk Management & Cybersecurity	92–98
		% of employees formally trained on Data Protection & Privacy	NA		118
	Financial Inclusion & Capacity Building	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	FN-CB-240a.1		127
		(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	FN-CB-240a.2	Financial Inclusion	127
		Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	FN-CB-240a.3		112
		Number of participants in financial literacy initiatives	FN-CB-240a.4		113
	Incorporation of Environmental, Social, and Governance Factors in Credit Analysis	Description of approach to incorporation of environmental, social and governance (ESG) factors in credit analysis	FN-CB-410a.2	ESRM	41–50
	Financed Emissions	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	FN-CB-410b.1		29
		Gross exposure for each industry by asset class	FN-CB-410b.2	Aligning portfolios and Reducing Financed Emissions	29
		Percentage of gross exposure included in the financed emissions calculation	FN-CB-410b.3		32
		Description of the methodology used to calculate financed emissions	FN-CB-410b.4		31-32
	Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	FN-CB-510a.1	Corporate Governance, Compliance and Code of Conduct	118
		Description of whistleblower policies and procedures	FN-CB-510a.2		82
Consumer Finance	Data Security	Card-related fraud losses from (1) card-not-present fraud and (2) card-present and other fraud	FN-CF-230a.2	Customer Privacy and Data Security	118

SASB data table – 2025

SASB topic	Accounting metric	Unit of measure	Reporting boundary[1]	2022	2023	2024	2025
Commercial Banks	Number of data security breaches[2]	#	ADCB UAE	-	-	0	0
	Percentage of employees formally trained on Data Protection & Privacy	%	Group[3][4]	97%	94%	97%	96%
	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development[5]	#	Group	2,129	2,493	3,025	2,221
		AED mn		1,980	2,266	3,726	2,681
	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development[5]	#	Group	159	137	234	449
		AED mn		100	103	131	82
	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers[6]	# ('000)	ADCB UAE	186	280	330	254
	Number of participants in financial literacy initiatives[7]	# ('000)	ADCB UAE	2,579	1,395	1,940	1,711
	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	million tCO_2e	ADCB UAE	Please refer to pages 29–32 of this report			
	Gross exposure for each industry by asset class	AED bn					
	Percentage of gross exposure included in the financed emissions calculation	%					
	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	AED	Group	0	0	0	0
Consumer Finance	Amount of fraudulent transaction activity (total value of account holder transactions refunded to account holders due to fraud) including recoveries through chargebacks[8]	AED mn	Group	Previously reported as not material		16.8	12.2
	Percentage of activity from card-not-present fraud (relates to online/e-commerce card transactions)[9]	%	Group			95	99
	Percentage of activity from card-present and other fraud (relates to in-store card transactions)[10]	%	Group			5	1

(1) Reported for ADCB (UAE, Egypt and Kazakhstan), AHB UAE unless otherwise stated
(2) Data security breaches are defined as confirmed incidents where customer data was accessed, exposed and exploited through unauthorised access to our information systems, resulting in a compromise of confidentiality, integrity or availability
(3) ADCB Group excluding ADCB Egypt and ADCB Kazakhstan
(4) Previously reported for ADCB Group. Reporting boundary restated in 2024 as ADCB Group (excluding ADCB Egypt and ADCB Kazakhstan)
(5) Loans qualified are extended to SMEs with annual sales turnover ≤ to AED 20 million under the following programmes; Khalifa fund, Sanadkum, Department of Finance (Government of UAE), Kazakhstan State 'Damu' Fund Programme
(6) Includes number of accounts opened for individuals through 'Hayyak' with salary < AED 5K/month in ADCB UAE
(7) Reported based on email open rates for 2022. From 2023 onwards, we have reported the unique number of participants
(8) Card-related fraud linked to customer usage at third-party merchants. (ADCB incurred a net loss of AED 0.02 million through card-related fraud in 2025)
(9) Card-related fraud for a transaction in a non-face-to-face setting with a merchant (conducted online)
(10) Card-related fraud for a transaction in a face-to-face setting with a merchant

SASB data table – 2025

SASB topic	Activity metric	Unit of measure	Reporting boundary[1]	2022	2023	2024	2025
Commercial Banks	Number of checking & savings accounts: Small Business	# ('000)	ADCB UAE	55.8	58.9	89.9	99.6
	Value of checking & savings accounts: Small Business	AED mn	ADCB UAE	16,719	19,351	23,286	28,331
	Number of loans: Small Business	# ('000)	Group	13.1	16.1	13.6	12.0
	Value of loans: Small Business	AED mn	Group	3,411	3,431	4,010	4,939
Consumer Finance	Numbers of unique customers with active credit card accounts	# ('000)	ADCB UAE	450	519	578	614
	Number of credit card accounts	# ('000)		538	650	754	808
Mortgage Finance	Number and value of residential mortgages originated	#	Group	2,311	3,090	3,318	1,960[3]
		AED mn		3,756	5,867	6,439	4,010[3]
	Number and value of commercial mortgages originated[2]	#	Group	4	7	8	20
		AED mn		4.9	18	42	78
	Number and value of residential mortgages purchased	#	Group	0	0	0	0
		AED mn		0	0	0	0
	Number and value of commercial mortgages purchased[2]	#	Group	0	0	0	0
		AED mn		0	0	0	0

(1) Reported for ADCB (UAE, Egypt and Kazakhstan), AHB UAE unless otherwise stated
(2) Our commercial mortgages relate to the SME segment
(3) Reported as ADCB Group (excluding ADCB Egypt)

ADX ESG disclosures

Environmental

ADX topic and sub-topic	ADX reporting metric	Unit of measure	Reporting boundary for 2025[1]	2022	2023	2024	2025
E1. Environmental Operations	E1.1) Does your company follow a formal Environmental Policy?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	E1.2) Does your company follow specific waste, water, energy, and/or recycling policies?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	E1.3) Does your company use a recognised energy management system?	Yes/No	ADCB Group	No	No	No	No
E2. Water Usage	E2.1) Total amount of water consumed[2]	Mega litres	UAE	96.62	148.32	131.77	115.02
	E2.2) Total amount of water reclaimed	Mega litres	UAE	N/A	N/A	N/A	N/A
E3. Waste Generation	E3.1) Total waste generated, per waste type:	kg	UAE[4]	388,093	402,006	407,962	432,286
	Paper	kg	UAE[4]	54,985	21,157	58,147	79,239
	Plastic	kg	UAE[4]	301	543	406	172
	Glass	kg	UAE[4]	-	-	-	-
	Cardboard	kg	UAE[4]	865	6,350	8,060	7,746
	General waste (including food waste)	kg	UAE[4]	322,542	373,956	341,349	345,129
	Hazardous	kg	UAE[4][5]	N/A	N/A	N/A	N/A
	E3.2) Percentage of waste recycled, per waste type						
	Paper	%	UAE[4]	100%	100%	100%	100%
	Plastic	%	UAE[4]	100%	100%	100%	100%
	Cardboard	%	UAE[4]	100%	100%	100%	100%
	General waste (including food waste)	%	UAE[4]	0%	0%	0%	0%
	Hazardous	%	UAE[4][5]	N/A	N/A	N/A	N/A
E4. Energy Usage[3]	E4.1) Total amount of energy directly consumed	MWh	ADCB Group	57,514	57,680	58,397	49,880
	E4.2) Total amount of energy indirectly consumed	MWh	ADCB Group	19,079	15,765	13,525	12,181

(1) UAE refers to: ADCB UAE, AHB UAE, ADCB Securities, ADCB Asset Management, ITMAM, ADCE, and excludes ADCB Egypt, ADCB Kazakhstan. ADCB Group refers to all the entities as described in the scope of reporting
(2) Disclosure on ADX topic E2 Water Usage is ADCB's water withdrawal data
(3) Reporting on environmental data for ADX topics E4, E5, E6, E7 and E8 for 2022-2023 covers ADCB Group (including our subsidiaries in Egypt and Kazakhstan). The boundary of reporting in 2024-2025 was expanded to include electricity consumption from branches in ADCB Egypt and therefore the reported figures are not comparable with the prior year (2022–2023) figures
(4) Reporting covers select facilities in the UAE including head office buildings (ADCB UAE and AHB UAE) and our warehouse in Abu Dhabi
(5) ADCB does not generate any hazardous waste

Environmental

ADX topic and sub-topic	ADX reporting metric	Unit of measure	Reporting boundary for 2025[1]	2022	2023	2024	2025
E6. Energy Mix[2][3]	E6.1) Percentage: Energy usage by generation type						
	Electricity	%	ADCB Group	95.25%	95.25%	92.49%	90.81%
	Natural Gas	%	ADCB Group	2.21%	2.18%	5.14%	6.61%
	Petrol	%	ADCB Group	2.51%	2.53%	1.71%	2.43%
	Diesel	%	ADCB Group	0.02%	0.04%	0.06%	0.15%
E7. GHG Emissions[2][4]	E7.1) Total amount in CO_2 equivalents, for Scope 1	tCO_2e	ADCB Group	633	644	960	1024
	E7.2) Total amount, in CO_2 equivalents, for Scope 2 (if) applicable	tCO_2e	ADCB Group	17,980	16,863	19,262	17,692
	E7.3) Total amount, in CO_2 equivalents,for Scope 3 (if) applicable	tCO_2e	ADCB Group	8,254	7,710	6,274	6,812
E8. Emissions Intensity[2][5]	E8.1) Total GHG emissions per output scaling factor	tCO2e/FTE	ADCB Group	2.73	2.51	2.69	2.63
	E8.2) Total non-GHG emissions per output scaling factor	KG/FTE	ADCB Group	N/A	N/A	N/A	N/A
E9. Environmental oversight	E9.1) Describe the climate-related risks and opportunities that could reasonably be expected to affect your organisation's prospects. Also explain, for each climate-related risk your organisation has identified, whether your organisation considers the risk to be a climate-related physical risk or transition risk.	Qualitative	UAE	For more information, please refer to: - Aligning portfolios and reducing financed emissions section , P: 29-32 - Sustainable finance section, P: 33-40 - Environmental and social risk management (ESRM) section, P: 41-50			
	E9.2) Describe the current and anticipated impacts of climate-related risks and opportunities on your organisation's business model and value chain.	Qualitative	UAE				
	E9.3) How has your organisation responded to, and plans to respond to, climate-related risks and opportunities in its strategy and decision-making, including the plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation?	Qualitative	UAE				
	E9.4) What are the current effects (during the reporting period) of climate-related risks and opportunities on your organisation's financial position, financial performance and cash flows for the reporting period (current financial effects)?	Qualitative	UAE	For more information, please refer to: - Sustainable finance section, P: 33-40 - Environmental and social risk management (ESRM) section, P: 41-50 ADCB will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of climate related risks and opportunities on financial position, financial performance and cash flows and factor into financial planning and strategy in the future			

(1) UAE refers to: ADCB UAE, AHB UAE, ADCB Securities, ADCB Asset Management, ITMAM, ADCE, and excludes ADCB Egypt, ADCB Kazakhstan. ADCB Group refers to all the entities as described in the scope of reporting

(2) Reporting on environmental data for ADX topics E4, E5, E6, E7 and E8 for 2022-2023 covers ADCB Group (including our subsidiaries in Egypt and Kazakhstan). The boundary of reporting in 2024-2025 was expanded to include electricity consumption from branches in ADCB Egypt and therefore the reported figures are not comparable with the prior year (2022–2023) figures

(3) Covers direct energy usage only

(4) Disclosures for ADX topic E7 were subject to external verification for the period 2022–2025

(5) Our disclosure on ADX topic E8 excludes Scope 3 emissions from properties leased to third parties

Environmental

ADX topic and sub-topic	ADX reporting metric	Unit of measure	Reporting boundary for 2025[1]	2022	2023	2024	2025
E10. Climate Related Risks and Opportunities	E10.1) Describe the processes and policies your organisation uses to identify, assess, prioritise, and monitor climate-related risks, and the inputs and parameters used in these processes.	Qualitative	UAE	For more information, please refer to Environmental and social risk management (ESRM) section, P: 41-50			
	E10.2) Whether and how does your organisation use climate-related scenario analysis to inform the identification of climate-related risks?	Qualitative	UAE				
E11. Climate Governance	E11.1) Which governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) is responsible for oversight of climate-related risks and opportunities?	Qualitative	UAE	For more information, please refer to: - Sustainability Governance Framework section, P: 16-17 - ADCB Group E&S risk governance framework , P: 41			
	E11.2) How does the body or individual consider climate-related risks and opportunities when overseeing your organisation's strategy?	Qualitative	UAE				
	E11.3) Are performance metrics related to climate targets included in remuneration policies? If so, how?	Qualitative	UAE				
	E11.4) Has your organisation delegated the role of overseeing climate-related risks and opportunities to a specific management-level position or committee, and how is oversight over this role or committee exercised?	Qualitative	UAE				
E12. Climate Targets	E12.1) Are performance metrics related to climate targets included in remuneration policies? If so, how?	Qualitative	UAE	For more information, please refer to: - Sustainability Governance Framework section, P: 16-17			

Social

S1. CEO Pay Ratio	S1.1) Ratio: CEO total compensation to median Full Time Equivalent (FTE) total compensation	X:1	UAE	N/A	N/A	N/A	N/A
	S1.2) Does your company report this metric in regulatory filings?	Yes/No	UAE	N/A	N/A	N/A	N/A
S2. Gender Pay Ratio[2][3]	S2.1) Ratio: Median male compensation to median female compensation	X:1	UAE	0.98	0.94	0.97	0.97
S3. Employee Turnover[4]	S3.1) Percentage: Year-over-year change for full-time employees	%	ADCB Group	9.71%	9.54%	11.03%	14.58%
	S3.2) Percentage: Year-over-year change for part-time employees	%	ADCB Group	-	-	-	-
	S3.3) Percentage: Year-over-year change for contractors/consultants	%	ADCB Group	0.01%	0.06%	0.17%	0.17%

(1) UAE refers to: ADCB UAE, AHB UAE, ADCB Securities, ADCB Asset Management, ITMAM, ADCE, and excludes ADCB Egypt, ADCB Kazakhstan. ADCB Group refers to all the entities as described in the scope of reporting
(2) Disclosures for ADX topic S2 were externally verified for the period 2022–2023
(3) Disclosure on ADX topic S2 from 2023 onwards includes CEO compensation.
(4) Reported as employee turnover (%)

Social (continued)

ADX topic and sub-topic	ADX reporting metric	Unit of measure	Reporting boundary for 2025[1]	2022	2023	2024	2025
S4. Gender diversity	S4.1) Percentage: Total enterprise headcount held by men and women						
	Men	%	ADCB Group	57.7%	56.9%	55.9%	55.7%
	Women	%	ADCB Group	42.3%	43.1%	44.1%	44.3%
	S4.2) Percentage: Entry- and mid-level positions held by men and women						
	Men	%	ADCB Group	57.1%	56.2%	55.2%	55.0%
	Women	%	ADCB Group	42.9%	43.8%	44.8%	45.0%
	S4.3) Percentage: Senior- and executive-level positions held by men and women						
	Men	%	ADCB Group	85.5%	84.6%	83.3%	82.0%
	Women	%	ADCB Group	14.5%	15.4%	16.7%	18.0%
S5. Temporary worker ratio	S5.1) Percentage: Total enterprise headcount held by part-time employees	%	ADCB Group	0.00%	0.00%	0.00%	0.00%
	S5.2) Percentage: Total enterprise headcount held by contractors and/or consultants	%	ADCB Group	0.01%	0.06%	0.18%	0.17%
S6. Nationalisation[2]	S6.1) Percentage of national employees, per employment category	%	UAE	38%	40%	39%	39%
S7. Non-Discrimination	S7.1) Does your company follow non-discrimination policy?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
S8. Health, Safety and Wellbeing	S8.1) Does your company follow an occupational health and/or health & safety policy?	Yes/No	UAE	Yes	Yes	Yes	Yes
S9. Injury Rate	S9.1) Percentage: Frequency of injury events relative to total workforce time	%	UAE	0	0	0	0
S10. Child and Forced Labor	S10.1) Does your company follow a child and/or forced labour policy?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	S10.2) If yes, does your child and/or forced labour policy also cover suppliers and vendors?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
S11. Human Rights	S11.1) Does your company follow a human rights policy?	Yes/No	UAE	ADCB complies with the UAE labour law			
	S11.2) If yes, does your human rights policy also cover suppliers and vendors? Yes/No	Yes/No	UAE				
S12. Community Investment	S12.1) Amount invested in the community, as a percentage of company revenues.	%	ADCB Group	0.03%	0.06%	0.07%	0.08%

(1) UAE refers to: ADCB UAE, AHB UAE, ADCB Securities, ADCB Asset Management, ITMAM, ADCE, and excludes ADCB Egypt, ADCB Kazakhstan. ADCB Group refers to all the entities as described in the scope of reporting

(2) Disclosures for ADX topic S6 were externally verified for the period 2022–2023

Governance

ADX topic and sub-topic	ADX reporting metric	Unit of measure	Reporting boundary for 2025[1]	2022	2023	2024	2025
G1. Board Independence	G1.1) Does company prohibit CEO from serving as board chair? Yes/No	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	G1.2) Percentage: Total board seats occupied by independent board members	%	ADCB Group	91%	91%	82%	73%
G2. Board Diversity	G2.1) Percentage: Total board seats occupied by men and women						
	Men	%	ADCB Group	82%	82%	82%	82%
	Women	%	ADCB Group	18%	18%	18%	18%
	G2.2) Percentage: Committee chairs occupied by men and women						
	Men	%	ADCB Group	75%	75%	75%	75%
	Women	%	ADCB Group	25%	25%	25%	25%
G3. Supplier Code of Conduct	G3.1) Are your vendors or suppliers required to follow a Code of Conduct?	Yes/No	UAE	Yes	Yes	Yes	Yes
	G3.2) If yes, what percentage of your suppliers have formally certified their compliance with the code	%	UAE	N/A	N/A	N/A	N/A
G4. Ethics and Prevention of Corruption	G4.1) Does your company follow an Ethics and/or Prevention of Corruption policy?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	G4.2) If yes, what percentage of your workforce has formally certified its compliance with the policy	%	ADCB Group	100%	100%	100%	100%
G5. Data Privacy	G5.1) Does your company follow a Data Privacy policy?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	G5.2) Has your company taken steps to comply with GDPR rules?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
G6. Sustainability Strategy	G6.1) Describe the sustainability-related risks and opportunities that could reasonably be expected to affect your organisation's prospects.	Qualitative	ADCB Group	For more information, please refer to: - ADCB's sustainability strategy section, P: 13 - Materiality assessment section, P: 21-24			
	G6.2) Describe the current and anticipated impacts of sustainability-related risks and opportunities on your organisation's business model and value chain.	Qualitative	ADCB Group				
	G6.3) Describe how your organisation responded to, and plans to respond to, sustainability-related risks and opportunities in its strategy and decision-making.	Qualitative	ADCB Group	For more information, please refer to: - ADCB's sustainability strategy section , P: 13 - Double materiality topics section, P: 21-24 - Strategic priorities, P: 29-50, 56-59, 73-74, 80-101			

(1) UAE refers to: ADCB UAE, AHB UAE, ADCB Securities, ADCB Asset Management, ITMAM, ADCE, and excludes ADCB Egypt, ADCB Kazakhstan. ADCB Group refers to all the entities as described in the scope of reporting

Governance

ADX topic and sub-topic	ADX reporting metric	Unit of measure	Reporting boundary for 2025[1]	2022	2023	2024	2025
G6. Sustainability Strategy (continued)	G6.4) Describe the current and anticipated effects (during the reporting period) of sustainability-related risks and opportunities on your organisation's business model, financial position, performance, and cash flows. How are these risks considered in financial planning (current financial effects)?	Qualitative	ADCB Group	For more information, please refer to: - ADCB's sustainability strategy section, P: 13 - Materiality assessment section, P: 21-24 Our financial materiality assessment relied on qualitative information and quantitative data (where available) to inform the assessment of effects of sustainability-related risks and opportunities. ADCB will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of sustainability-related risks and opportunities on financial position, financial performance and cash flows in the future			
G7. Sustainability Risks Management	G7.1) Describe the processes and policies your organisation uses to identify, assess, prioritise, and monitor sustainability-related risks, and the inputs and parameters used in these processes.	Qualitative	ADCB Group	For more information, please refer to: - Materiality assessment section, P: 21-24 - Environmental and social risk management (ESRM) section, P: 41-50			
	G7.2) How are the processes for identifying, assessing, prioritising and monitoring sustainability-related risks and opportunities integrated into and informing your organisation's overall enterprise risk management process?	Qualitative	ADCB Group				
G8. Sustainability Governance	G8.1) Which governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) is responsible for oversight of sustainability-related risks and opportunities?	Qualitative	ADCB Group	For more information, please refer to: - Sustainability governance framework section, P: 16-17			
	G8.2) How does the body or individual consider sustainability-related risks and opportunities when overseeing your organisation’s strategy?	Qualitative	ADCB Group	For more information, please refer to: - Sustainability Governance Framework section, P: 16-17 - ADCB Group E&S risk governance framework , P: 41			
	G8.3) Are performance metrics related to these targets included in remuneration policies? If so, how?	Qualitative	ADCB Group	For more information, please refer to: - Sustainability Governance Framework section, P: 16-17			
	G8.4) Has your organisation delegated the role of overseeing sustainability-related risks and opportunities to a specific management-level position or committee, and how is oversight over this role or committee exercised?	Qualitative	ADCB Group	For more information, please refer to: - Sustainability Governance Framework section, P: 16-17 - ADCB Group E&S risk governance framework , P: 41			
G9. Sustainability Targets	G9.1) What metrics does your organisation use to measure and monitor each sustainability-related risk or opportunity identified above?	Qualitative	ADCB Group	For more information, please refer to: - Strategic priorities, P: 29-50, 56-59, 73-74, 80-101 - Data and assurance, P: 107-120			
G10. Disclosure Practices	G10.1) Does your company publish a sustainability report?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	G10.2) Does your company publish a GRI, IFRS, CDP, SASB, IIRC, or UNGC based report?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
G11. External Assurance[2]	G11.1) Are your sustainability disclosures assured or verified by a third-party audit firm?	Yes/No	ADCB Group	Yes	Yes	Yes	Yes

(1) UAE refers to: ADCB UAE, AHB UAE, ADCB Securities, ADCB Asset Management, ITMAM, ADCE, and excludes ADCB Egypt, ADCB Kazakhstan. ADCB Group refers to all the entities as described in the scope of reporting

(2) Disclosures for ADX topic E7 were subject to external verification for the period 2022–2025, while disclosures for ADX topics S2 and S6 were externally verified for the period 2022–2023

Integrated KPIs

ADX topic and sub-topic	ADX reporting metric	Unit of measure	Reporting boundary for 2025[1]	2022	2023	2024	2025
I1. Sustainability Reporting	I1.1) Does your company publish a sustainability report? Yes/No	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
I2. ESG Ratings	I2.1) Has your company received an ESG rating (solicited or unsolicited)? Yes/No	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	I2.2) If yes, provide the latest overall ESG score	%	ADCB Group	For more information, please refer to: - ADCB's integrated approach to sustainability section, P: 12			
I3. Stakeholder Engagement	I3.1) Does your company engage with stakeholders on ESG/sustainability topics? Yes/No	Yes/No	ADCB Group	Yes	Yes	Yes	Yes
	I3.2) If yes, report on frequency and effectiveness of engagement	%	ADCB Group	For more information, please refer to: - Stakeholder engagement section, P: 20			

(1) UAE refers to: ADCB UAE, AHB UAE, ADCB Securities, ADCB Asset Management, ITMAM, ADCE, and excludes ADCB Egypt, ADCB Kazakhstan. ADCB Group refers to all the entities as described in the scope of reporting

IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information

ADCB acknowledges the significance of the IFRS Sustainability Disclosure Standards (SDS) in driving decision-useful, globally comparable sustainability-related disclosures that meet the information needs of our investors. This section covers our disclosures informed by the requirements of IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information.

The Bank will continue to assess the reporting requirements and develop internal capabilities in preparation for adoption of all the requirements of the IFRS Sustainability Disclosure Standards in future reporting periods.

Governance

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-27 (a): The governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of sustainability-related risks and opportunities, including information about:	I. How responsibilities for sustainability-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s)	• 2025 ADCB ESG Report, P: 16, 41 • 2025 ADCB Annual Report, P: 200-202, 216-217, 238-241
	II. How the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to sustainability-related risks and opportunities	• 2025 ADCB ESG Report, P: 16 • 2025 ADCB Annual Report, P: 214-215
	III. How and how often the body(s) or individual(s) is informed about sustainability-related risks and opportunities	• 2025 ADCB ESG Report, P: 16, 41 • 2025 ADCB Annual Report, P: 232-235
	IV. How the body(s) or individual(s) takes into account sustainability-related risks and opportunities when overseeing the entity's strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities	• 2025 ADCB ESG Report, P: 16, 41, 81-84 • 2025 ADCB Annual Report, P: 200-202, 216-217, 238-241 • 2025 ADCB Integrated Report, P: 8-12
	V. How the body(s) or individual(s) oversees the setting of targets related to sustainability-related risks and opportunities, and monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies	• 2025 ADCB ESG Report, P: 16, 41, 81-84 • 2025 ADCB Annual Report, P: 200-202, 216-217, 238-243
IFRS S1-27 (b): Management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities, including information about:	I. Whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee	• 2025 ADCB ESG Report, P: 16-17, 41 • 2025 ADCB Annual Report, P: 163-169, 176, 218 • 2025 ADCB Integrated Report, P: 8-12
	II. Whether management uses controls and procedures to support the oversight of sustainability-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions	

Strategy | Sustainability-related risks and opportunities

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-30 (a)	Sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects	• 2025 ADCB ESG Report, ADCB Sustainability Strategy, P: 13 • 2025 ADCB ESG Report, Materiality assessment, P: 21-24
IFRS S1-30 (b)	The time horizons—short, medium or long term—over which the effects of each of those sustainability-related risks and opportunities could reasonably be expected to occur	
IFRS S1-30 (c)	The definitions of 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the entity for strategic decision-making	

Strategy | Business model and value chain

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-32 (a)	A description of the current and anticipated effects of sustainability-related risks and opportunities on the entity's business model and value chain	• 2025 ADCB ESG Report, ADCB Sustainability Strategy, P: 13 • 2025 ADCB ESG Report, Materiality assessment, P: 21-24
IFRS S1-32 (b)	A description of where in the entity's business model and value chain sustainability-related risks and opportunities are concentrated (for example, geographical areas, facilities and types of assets)	

Strategy | Strategy and decision-making

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-33 (a)	How the entity has responded to, and plans to respond to, sustainability-related risks and opportunities in its strategy and decision-making	• 2025 ADCB ESG Report, ADCB Sustainability Strategy, P: 13 • 2025 ADCB ESG Report, Materiality assessment, P: 21-24 • 2025 ADCB ESG Report, Strategic priorities, P: 25-105 • 2025 ADCB ESG Report, Data and assurance, P: 106-120, 126-135
IFRS S1-33 (b)	The progress against plans the entity has disclosed in previous reporting periods, including quantitative and qualitative information	
IFRS S1-33 (c)	Trade-offs between sustainability-related risks and opportunities that the entity considered (for example, in making a decision on the location of new operations, an entity might have considered the environmental impacts of those operations and the employment opportunities they would create in a community)	

Strategy | Financial position, financial performance and cash flows

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-34 (a)	The effects of sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period (current financial effects)	• 2025 ADCB ESG Report, ADCB Sustainability Strategy, P: 13 • 2025 ADCB ESG Report, Materiality assessment, P: 21-24 Our financial materiality assessment (P: 21-24) relied on qualitative information and quantitative data (where available) to inform the assessment of effects of sustainability-related risks and opportunities. ADCB will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of sustainability-related risks and opportunities on financial position, financial performance and cash flows and factor into financial planning and strategy in the future.
IFRS S1-34 (b)	The anticipated effects of sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how sustainability-related risks and opportunities are included in the entity's financial planning (anticipated financial effects)	
IFRS S1-35 (a)	Quantitative and qualitative information about how sustainability-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period	
IFRS S1-35 (b)	Quantitative and qualitative information about the sustainability-related risks and opportunities identified in 35(a) for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements	
IFRS S1-35 (c): Quantitative and qualitative information about how the entity expects its financial position to change over the short, medium and long term, given its strategy to manage sustainability-related risks and opportunities, taking into consideration:	I. Its investment and disposal plans (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements), including plans the entity is not contractually committed to	
	II. Its planned sources of funding to implement its strategy	
IFRS S1-35 (d)	Quantitative and qualitative information about how the entity expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage sustainability-related risks and opportunities	

Strategy | Resilience

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-41	A qualitative and, if applicable, quantitative assessment of the resilience of its strategy and business model in relation to its sustainability-related risks, including information about how the assessment was carried out and its time horizon	• 2025 ADCB ESG Report, Aligning portfolios and reducing financed emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management (ESRM), P: 41-50 ADCB will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of sustainability-related risks and opportunities on financial position, financial performance and cash flows and factor into financial planning and strategy in the future.

Risk management

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-44 (a): The processes and related policies the entity uses to identify, assess, prioritise and monitor sustainability-related risks, including information about:	I. The inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes)	• 2025 ADCB ESG Report, Materiality assessment, P: 21-24 • 2025 ADCB ESG Report, Aligning portfolios and reducing financed emissions, P: 29-32 • 2025 ADCB ESG Report, Environmental and Social Risk Management (ESRM), P: 41-50 ADCB will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of sustainability-related risks on financial position, financial performance and cash flows and factor into financial planning, strategy, and risk management in the future.
	II. Whether and how the entity uses scenario analysis to inform its identification of sustainability-related risks	
	III. How the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria)	
	IV. Whether and how the entity prioritises sustainability-related risks relative to other types of risk	
	V. How the entity monitors sustainability-related risks	
	VI. Whether and how the entity has changed the processes it uses compared with the previous reporting period	
IFRS S1-44 (b)	The processes the entity uses to identify, assess, prioritise and monitor sustainability-related opportunities	
IFRS S1-44 (c)	The extent to which, and how, the processes for identifying, assessing, prioritising and monitoring sustainability-related risks and opportunities are integrated into and inform the entity's overall risk management process	

Metrics and targets

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S1-46 (a)	Metrics required by an applicable IFRS Sustainability Disclosure Standard for each sustainability-related risk and opportunity that could reasonably be expected to affect the entity's prospects	• 2025 ADCB ESG Report, Strategic Priorities, P: 25-105 • 2025 ADCB ESG Report, Data and assurance, P: 107-120, 126-135
IFRS S1-46 (b)	Metrics the entity uses to measure and monitor that sustainability-related risk or opportunity and its performance in relation to that sustainability-related risk or opportunity, including progress towards any targets the entity has set, and any targets it is required to meet by law or regulation	We will continue to assess metrics to monitor our performance in relation to sustainability-related risks and opportunities identified for ADCB and will evaluate other applicable targets in the future.
IFRS S1-51 (a)	The metric used to set the target and to monitor progress towards reaching the target	ADCB's climate strategy is aligned with the UAE's Net Zero by 2050 Strategic Initiative and the objectives of the Paris Agreement. In 2025, the Bank introduced its first sectoral decarbonisation targets for oil and gas extraction and power generation, reflecting its focus on the most emissions-intensive sectors within its portfolio. These targets are grounded in realistic, region-specific decarbonisation pathways and informed by client transition commitments and are aligned with the UAE's Nationally Determined Contribution (NDC 3.0). Through this approach, ADCB supports long-term growth, financial resilience and an orderly transition of the real economy. ADCB believes that the systematic integration of environmental, social and governance considerations across its investments, lending activities, products and services enhances business performance while contributing to sustainable development. Through its sustainable finance approach, the Bank strengthens resilience, supports long-term financial returns and enables clients to transition towards lower-carbon business models. This commitment is formalised through ADCB's transition plan, which provides a structured framework to guide the development of products, services and engagement strategies that support credible and measurable progress towards net zero. Client transition assessment and engagement form a core pillar of this plan, reflecting the Bank's emphasis on partnership-led transition. This approach is consistent with ADCB's commitment as a signatory to the UAE Climate-Responsible Companies Pledge and reinforces its role in advancing the UAE's Net Zero by 2050 ambition. Please refer to the following sections in the 2025 ADCB ESG Report for further information on ADCB's climate and sustainable finance targets: • Aligning Portfolios and Reducing Financed Emissions, P: 29-32 • Sustainable Finance, P: 33-40
IFRS S1-51 (b)	The specific quantitative or qualitative target the entity has set or is required to meet	
IFRS S1-51 (c)	The period over which the target applies	
IFRS S1-51 (d)	The base period from which progress is measured	
IFRS S1-51 (e)	Any milestones and interim targets	
IFRS S1-51 (f)	Performance against each target and an analysis of trends or changes in the entity's performance	
IFRS S1-51 (g)	Any revisions to the target and an explanation for those revisions	

IFRS S2 Climate-related Disclosures Content Index (aligned to TCFD recommendations)

This section covers our enhanced disclosures on climate-related risks and opportunities informed by the requirements of IFRS S2 Climate-related Disclosure Standard. The IFRS S2 standard is aligned to the disclosure recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD), and our disclosures in 2025 build on our TCFD disclosures from previous years.

The Bank will continue to assess the reporting requirements and develop internal capabilities in preparation for adoption of all the requirements of the IFRS Sustainability Disclosure Standards in future reporting periods.

Governance

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-6 (a): The governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of climate-related risks and opportunities.	I. how responsibilities for climate-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s)	• 2025 ADCB ESG Report, P: 16, 41 • 2025 ADCB Annual Report, P: 200-202, 216-217, 238-241
	II. how the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to climate-related risks and opportunities	• 2025 ADCB ESG Report, P: 16, 41 • 2025 ADCB Annual Report, P: 214-215
	III. how and how often the body(s) or individual(s) is informed about climate-related risks and opportunities	• 2025 ADCB ESG Report, P: 16, 41 • 2025 ADCB Annual Report, P: 232-235
	IV. how the body(s) or individual(s) takes into account climate-related risks and opportunities when overseeing the entity's strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities	• 2025 ADCB ESG Report, P: 16, 41 • 2025 ADCB Annual Report, P: 200-202, 216-217, 238-241 • 2025 ADCB Integrated Report, P:8-12
	V. how the body(s) or individual(s) oversees the setting of targets related to climate-related risks and opportunities, and monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies	• 2025 ADCB ESG Report, P: 16, 29-50, 81-84 • 2025 ADCB Annual Report, P: 200-202, 216-217, 238-243
IFRS S2-6 (b): Management's role in the governance processes, controls and procedures used to monitor, manage and oversee climate-related risks and opportunities	I. whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee	• 2025 ADCB ESG Report, P: 16-17, 29-50 • 2025 ADCB Annual Report, P: 163-169, 176, 218 • 2025 ADCB Integrated Report, P:8-12
	II. whether management uses controls and procedures to support the oversight of climate-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions	

Strategy

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-9 (a)	Describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects	For description on the material topics for ADCB, please refer to the 'Materiality assessment' (P: 21-24) of the 2025 ADCB ESG Report. For climate-related risks, please refer to the 'Aligning Portfolios and Reducing Financed Emissions' (P: 29-32) and 'Environmental and Social Risk Management (ESRM) (P: 41-50) of the 2025 ESG Report. For climate-related opportunities, please refer to the 'Sustainable Finance' section of the 2025 ESG Report, (P: 33-40). Also, refer to the 2025 Green Bond Report.
IFRS S2-9 (b)	The current and anticipated effects of those climate-related risks and opportunities on the entity's business model and value chain	
IFRS S2-9 (c)	The effects of those climate-related risks and opportunities on the entity's strategy and decision-making, including information about its climate-related transition plan	
IFRS S2-9 (d)	The effects of those climate-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period, and their anticipated effects on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how those climate-related risks and opportunities have been factored into the entity's financial planning	• 2025 ADCB ESG Report, Aligning Portfolios & Reducing Financed Emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 41-50 ADCB will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of climate-related risks and opportunities on financial position, financial performance and cash flows and factor into financial planning and strategy in the future
IFRS S2-9 (e)	The climate resilience of the entity's strategy and its business model to climate-related changes, developments and uncertainties, taking into consideration the entity's identified climate-related risks and opportunities	

Strategy | Climate-related risks and opportunities

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-10 (a)	Climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects	• 2025 ADCB ESG Report, Materiality assessment, P: 21-24 • 2025 ADCB ESG Report, Aligning Portfolios & Reducing Financed Emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 41-50
IFRS S2-10 (b)	For each climate-related risk the entity has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk	• 2025 ADCB ESG Report, Materiality assessment, P: 21-24 • 2025 ADCB ESG Report, Environmental & social risk management, P: 41-50
IFRS S2-10 (c)	For each climate-related risk and opportunity the entity has identified, over which time horizons—short, medium or long term—the effects of each climate-related risk and opportunity could reasonably be expected to occur	
IFRS S2-10 (d)	How the entity defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the entity for strategic decision-making	

Strategy | Business model and value chain

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-13 (a)	A description of the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain	• 2025 ADCB ESG Report, Materiality assessment, P: 21-24 • 2025 ADCB ESG Report, Aligning Portfolios & Reducing Financed Emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 41-50 ADCB will continue to enhance its methodologies for identifying and evaluating climate-related risks and opportunities across its business model, operations, client relationships and financed activities. These assessments will improve understanding of where such risks and opportunities are concentrated and their potential financial impacts, with outcomes progressively incorporated into financial planning, strategy and decision-making.
IFRS S2-13 (b)	A description of where in the entity's business model and value chain climate-related risks and opportunities are concentrated (for example, geographical areas, facilities and types of assets)	

Strategy | Strategy and decision-making

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-14 (a): How the entity has responded to, and plans to respond to, climate-related risks and opportunities in its strategy and decision-making, including how the entity plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation, including the information about:	I. Current and anticipated changes to the entity's business model, including its resource allocation, to address climate-related risks and opportunities (for example, these changes could include plans to manage or decommission carbon-, energy- or water-intensive operations; resource allocations resulting from demand or supply-chain changes; resource allocations arising from business development through capital expenditure or additional expenditure on research and development; and acquisitions or divestments)	ADCB's climate strategy is aligned with the UAE's Net Zero by 2050 Strategic Initiative and the Paris Agreement. In 2025, the Bank introduced its first sectoral decarbonisation targets for oil and gas extraction and power generation, grounded in region-specific pathways, client transition commitments and the UAE's Nationally Determined Contribution (NDC 3.0) targets. ADCB systematically integrates environmental, social and governance considerations across its investments, lending, products and services to enhance business performance, strengthen resilience and support clients in transitioning towards lower-carbon business models. This commitment is formalised through ADCB's transition plan, which provides a structured framework for developing products, services and engagement strategies that support credible progress towards net zero. Client transition assessment and engagement form a core pillar of this plan, reinforcing the Bank's role as a signatory to the UAE Climate-Responsible Companies Pledge in advancing the UAE's net zero ambition. • 2025 ADCB ESG Report, Aligning Portfolios & Reducing Financed Emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 41-50
	II. Current and anticipated direct mitigation and adaptation efforts (for example, through changes in production processes or equipment, relocation of facilities, workforce adjustments, and changes in product specifications)	
	III. Current and anticipated indirect mitigation and adaptation efforts (for example, through working with customers and supply chains)	
	IV. Any climate-related transition plan the entity has, including information about key assumptions used in developing its transition plan, and dependencies on which the entity's transition plan relies	
	V. How the entity plans to achieve any climate-related targets, including any greenhouse gas emissions targets	
IFRS S2-14 (b)	How the entity is resourcing, and plans to resource, the activities disclosed in accordance with 14(a)	
IFRS S2-14 (c)	Quantitative and qualitative information about the progress of plans disclosed in previous reporting periods in accordance with 14(a)	

Strategy | Financial position, financial performance and cash flows

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-15 (a)	The effects of climate-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period (current financial effects)	• 2025 ADCB ESG Report, Aligning Portfolios & Reducing Financed Emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 41-50 In addition to our existing disclosures, ADCB will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of climate-related risks and opportunities on financial position, financial performance and cash flows and factor into financial planning and strategy in the future. The assessment of the effects of climate-related risks and opportunities will also inform the further development of ADCB's climate transition plan.
IFRS S2-15 (b)	The anticipated effects of climate-related risks and opportunities on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how climate-related risks and opportunities are included in the entity's financial planning (anticipated financial effects)	
IFRS S2-16 (a)	How climate-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period	
IFRS S2-16 (b)	The climate-related risks and opportunities identified in 16(a) for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements	
IFRS S2-16 (c): How the entity expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities, taking into consideration:	I. Its investment and disposal plans (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements), including plans the entity is not contractually committed to II. Its planned sources of funding to implement its strategy	• 2025 ADCB ESG Report, ADCB integrated approach to sustainability, P: 12 • 2025 ADCB ESG Report, ADCB sustainability strategy, P: 13 • 2025 ADCB ESG Report, ADCB's 5-year strategy for a sustained pace of growth, P: 10 • 2025 ADCB ESG Report, ADCB's climate framework, P: 27 • 2025 ADCB ESG Report, Aligning Portfolios & Reducing Financed Emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 41-50 Sustainability is fully integrated into ADCB's corporate strategy, with delivery of key sustainability milestones linked to executive remuneration for the Group CEO and Group CFO. Oversight is provided through an approved ESG roadmap monitored by senior management, and through sustainability targets embedded in the Board-approved Risk Appetite Statement, with regular reporting to the Board Risk Committee and Risk Management Committee, ensuring sustainability is embedded in strategic and risk decision-making. The Bank will continue to assess methodologies and processes that would help to further enhance identification and measurement of relevant effects of climate-related risks and opportunities on financial position, financial performance and cash flows and factor into financial planning and strategy in the future.
IFRS S2-16 (d)	How the entity expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities (for example, increased revenue from products and services aligned with a lower-carbon economy; costs arising from physical damage to assets from climate events; and expenses associated with climate adaptation or mitigation)	

Strategy | Climate resilience

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-22 (a): The entity's assessment of its climate resilience as at the reporting date, including the information about:	I. The implications, if any, of the entity's assessment for its strategy and business model, including how the entity would need to respond to the effects identified in the climate-related scenario analysis	• 2025 ADCB ESG Report, Environmental & Social Risk Management, P: 47-50
	II. The significant areas of uncertainty considered in the entity's assessment of its climate resilience	
	III. The entity's capacity to adjust or adapt its strategy and business model to climate change over the short, medium and long term, including 1) The availability of, and flexibility in, the entity's existing financial resources to respond to the effects identified in the climate-related scenario analysis, including to address climate-related risks and to take advantage of climate-related opportunities 2) The entity's ability to redeploy, repurpose, upgrade or decommission existing assets 3) The effect of the entity's current and planned investments in climate-related mitigation, adaptation and opportunities for climate resilience	
IFRS S2-22 (b): How and when the climate-related scenario analysis was carried out, including the information about:	I. The inputs the entity used, including: 1) Which climate-related scenarios the entity used for the analysis and the sources of those scenarios. 2) Whether the analysis included a diverse range of climate-related scenarios 3) Whether the climate-related scenarios used for the analysis are associated with climate-related transition risks or climate-related physical risks 4) Whether the entity used, among its scenarios, a climate-related scenario aligned with the latest international agreement on climate change 5) Why the entity decided that its chosen climate-related scenarios are relevant to assessing its resilience to climate-related changes, developments or uncertainties 6) The time horizons the entity used in the analysis 7) What scope of operations the entity used in the analysis (for example, the operating locations and business units used in the analysis)	
	II. The key assumptions the entity made in the analysis, including assumptions about: 1) Climate-related policies in the jurisdictions in which the entity operates 2) Macroeconomic trends 3) National- or regional-level variables (for example, local weather patterns, demographics, land use, infrastructure and availability of natural resources) 4) Energy usage and mix 5) Developments in technology	
	III. The reporting period in which the climate-related scenario analysis was carried out	

Risk management

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-25 (a): The processes and related policies the entity uses to identify, assess, prioritise and monitor climate-related risks, including information about:	I. The inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes)	• 2025 ADCB ESG Report, Aligning Portfolios & Reducing Financed Emissions, P: 29-32 • 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 41-50
	II. Whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related risks	
	III. How the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria)	
	IV. Whether and how the entity prioritises climate-related risks relative to other types of risk	
	V. How the entity monitors climate-related risks	
	VI. Whether and how the entity has changed the processes it uses compared with the previous reporting period	
IFRS S2-25 (b)	The processes the entity uses to identify, assess, prioritise and monitor climate-related opportunities, including information about whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related opportunities	
IFRS S2-25 (c)	The extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the entity's overall risk management process	

Metrics and targets | Climate-related metrics

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-29 (a): Information relevant to the cross-industry metric categories of greenhouse gases, including:	I. Absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tonnes of CO_2 equivalent, classified as: 1) Scope 1 greenhouse gas emissions 2) Scope 2 greenhouse gas emissions 3) Scope 3 greenhouse gas emissions	• 2025 ADCB ESG Report, Data and assurance, P: 111
	II. Measure its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless required by a jurisdictional authority or an exchange on which the entity is listed to use a different method for measuring its greenhouse gas emissions	• 2025 ADCB ESG Report, Data and assurance, P: 107-109
	III. Disclose the approach it uses to measure its greenhouse gas emissions including: 1) The measurement approach, inputs and assumptions the entity uses to measure its greenhouse gas emissions; 2) The reason why the entity has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions; and 3) Any changes the entity made to the measurement approach, inputs and assumptions during the reporting period and the reasons for those changes;	• 2025 ADCB ESG Report, Aligning Portfolios and Reducing Financed Emissions, P: 30-32 • 2025 ADCB ESG Report, Data and assurance, P: 107-109, 111
	IV. For Scope 1 and Scope 2 greenhouse gas emissions disclosed (disclose its absolute gross greenhouse gas emissions) disaggregate emissions between: 1) The consolidated accounting group (for example, for an entity applying IFRS Accounting Standards, this group would comprise the parent and its consolidated subsidiaries); and 2) Other investees excluded, for an entity applying IFRS Accounting Standards, these investees would include associates, joint ventures and unconsolidated subsidiaries)	• 2025 ADCB ESG Report, Data and assurance, P: 107, 111
	V. For Scope 2 greenhouse gas emissions, disclose location-based Scope 2 greenhouse gas emissions, and provide information about any contractual instruments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse gas emissions	• 2025 ADCB ESG Report, Data and assurance, P: 108, 111
	VI. For Scope 3 greenhouse gas emissions disclose, 1) The categories included within the entity's measure of Scope 3 greenhouse gas emissions, in accordance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011); and 2) Additional information about the entity's Category 15 greenhouse gas emissions or those associated with its investments (financed emissions), if the entity's activities include asset management, commercial banking or insurance	• 2025 ADCB ESG Report, Data and assurance, P: 109, 111 • 2025 ADCB ESG Report, Aligning Portfolios and Reducing Financed Emissions, P: 30-32
IFRS S2-29 (b)	Climate-related transition risks—the amount and percentage of assets or business activities vulnerable to climate-related transition risks	• 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 42 • 2025 ADCB ESG Report, Data and assurance, P: 110-111

Metrics and targets | Climate-related metrics (continued)

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-29 (c)	Climate-related physical risks—the amount and percentage of assets or business activities vulnerable to climate-related physical risks	• 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 42-44, 48-49 • 2025 ADCB ESG Report, Data and assurance, P: 110
IFRS S2-29 (d)	Climate-related opportunities—the amount and percentage of assets or business activities aligned with climate-related opportunities	• 2025 ADCB ESG Report, Sustainable Finance, P: 33-40 • 2025 ADCB ESG Report, Data and assurance, P: 110
IFRS S2-29 (e)	Capital deployment—the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities	• 2025 ADCB ESG Report, Environmental and Social Risk Management, P: 48-49
IFRS S2-29 (f): Internal carbon prices—the entity shall disclose:	I. An explanation of whether and how the entity is applying a carbon price in decision-making (for example, investment decisions, transfer pricing and scenario analysis) II. The price for each metric tonne of greenhouse gas emissions the entity uses to assess the costs of its greenhouse gas emissions	ADCB's climate strategy is aligned with the UAE's Net Zero by 2050 Strategic Initiative and the objectives of the Paris Agreement. In 2025, the Bank introduced its first sectoral decarbonisation targets for oil and gas extraction and power generation, reflecting its focus on the most emissions-intensive sectors within its portfolio. These targets are grounded in realistic, region-specific decarbonisation pathways and informed by client transition commitments and are aligned with the UAE's Nationally Determined Contribution (NDC 3.0). Through this approach, ADCB supports long-term growth, financial resilience and an orderly transition of the real economy. This commitment is formalised through ADCB's transition plan, which provides a structured framework for developing products, services and engagement strategies that support credible progress towards net zero. Client transition assessment and engagement form a core pillar of this plan, reinforcing the Bank's role as a signatory to the UAE Climate-Responsible Companies Pledge in advancing the UAE's net zero ambition. We will assess the feasibility and application of internal carbon prices to help us achieve our targets as part of implementation of ADCB's climate transition plan in the future.
IFRS S2-29 (g): Remuneration, including the information about:	I. A description of whether and how climate-related considerations are factored into executive remuneration II. The percentage of Executive Management remuneration recognised in the current period that is linked to climate-related considerations	Please refer to the following for further details on how ESG KPIs (including milestones and targets linked to our climate framework) are linked to executive remuneration • 2025 ADCB ESG Report, P: 12, 16, 89 • 2025 ADCB Integrated Report, P: 82 In addition, progress against the Bank's E&S Key Risk Indicators disclosed on P: 42 of the 2025 ADCB ESG Report are also linked to executive remuneration.

Metrics and targets | Climate-related targets: Quantitative and qualitative climate-related targets

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-33 (a)	The metric used to set the target	ADCB's climate strategy is aligned with the UAE's Net Zero by 2050 Strategic Initiative and the Paris Agreement. In 2025, the Bank introduced its first sectoral decarbonisation targets for oil and gas and power, focused on the most emissions-intensive sectors. These targets are grounded in region-specific pathways, client transition commitments and the UAE's NDC 3.0, supporting long-term growth, financial resilience and an orderly transition. For more information about ADCB's sector decarbonisation targets, please refer to P: 29-30 of this report. In addition, ADCB is committed to supporting our customers in their transition to a net zero economy through our sustainable financing. Please refer to P: 33 of this ESG Report for further details on our Sustainable Finance target. Climate targets are embedded in the Board-approved Risk Appetite Statement and monitored as part of enterprise risk management. For more details, please refer to P: 42 of this report.
IFRS S2-33 (b)	The objective of the target (for example, mitigation, adaptation or conformance with science-based initiatives)	
IFRS S2-33 (c)	The part of the entity to which the target applies (for example, whether the target applies to the entity in its entirety or only a part of the entity, such as a specific business unit or specific geographical region)	
IFRS S2-33 (d)	The period over which the target applies	
IFRS S2-33 (e)	The base period from which progress is measured	
IFRS S2-33 (f)	Any milestones and interim targets	
IFRS S2-33 (g)	If the target is quantitative, whether it is an absolute target or an intensity target	
IFRS S2-33 (h)	How the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target	

Metrics and targets | Climate-related targets: Approach to setting and reviewing each target, and monitoring progress against each target

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-34 (a)	Whether the target and the methodology for setting the target has been validated by a third party	Please refer to the following sections in the 2025 ADCB ESG Report • Aligning Portfolios and Reducing Financed Emissions, P: 29-32 • Sustainable Finance, P: 33-40 • Environmental and Social Risk Management (ESRM), P: 42
IFRS S2-34 (b)	The entity's processes for reviewing the target	
IFRS S2-34 (c)	The metrics used to monitor progress towards reaching the target	
IFRS S2-34 (d)	Any revisions to the target and an explanation for those revisions	

Metrics and targets | Climate-related targets: Performance against each climate-related target and an analysis of trends or changes in the entity's performance

Reference number	Disclosure description	ADCB's disclosure references and/or explanation
IFRS S2-35	An entity shall disclose information about its performance against each climate-related target and an analysis of trends or changes in the entity's performance	For information on ADCB's sector decarbonisation targets and progress for Oil and gas and Power sectors, please refer to P: 29-30 of this report. We will assess the feasibility and application of carbon credits as part of implementation of ADCB's climate transition plan in the future.
IFRS S2-36 (a)	Which greenhouse gases are covered by the target	
IFRS S2-36 (b)	Whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target	
IFRS S2-36 (c)	Whether the target is a gross greenhouse gas emissions target or net greenhouse gas emissions target. If the entity discloses a net greenhouse gas emissions target, the entity is also required to separately disclose its associated gross greenhouse gas emissions target	
IFRS S2-36 (d)	Whether the target was derived using a sectoral decarbonisation approach	
IFRS S2-36 (e): The entity's planned use of carbon credits to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target, including the information about:	I. The extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits	
	II. Which third-party scheme(s) will verify or certify the carbon credits	
	III. The type of carbon credit, including whether the underlying offset will be nature-based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal	
	IV. Any other factors necessary for users of general purpose financial reports to understand the credibility and integrity of the carbon credits the entity plans to use (for example, assumptions regarding the permanence of the carbon offset)	

Assurance report

Deloitte.

Deloitte & Touche (M.E.)

Level 11, Al Sila Tower
Abu Dhabi Global Market Square, Al Maryah Island
P.O. Box 990 Abu Dhabi, United Arab Emirates

Tel: +971 0 2 408 2424
Fax:+971 0 2 408 2525
www.deloitte.com

Table 1: Selected Information

Selected Information	Assured figure for the year ended 31 December 2025	Report pages	Applicable Criteria
Scope 1 GHG emissions	1,024 (tCO_2e)	Pg. 28, 51, 111, 130	Pg. 108
Scope 2 GHG emissions	17,692 (tCO_2e)	Pg. 28, 51, 111, 130	Pg. 108
Scope 3 Operational GHG emissions	6,812 (tCO_2e)	Pg. 28, 51, 111, 130	Pg. 109
Total amount of Sustainable Financing	71.9 AED billion	Pg. 9, 15, 27, 33, 110	Pg. 109

Selected Information	Assured figure for the year ended 31 December 2024	Report pages	Applicable Criteria
Scope 3 Financed GHG emissions	15.81 (million tCO_2e)	Pg. 28, 29, 111	Pg. 29-32

Selected Information	Assured figure for the year ended 31 December 2023 (recalculated)	Report pages	Applicable Criteria
Scope 3 Financed GHG emissions	13.58 (million tCO_2e)	Pg. 29, 30, 111	Pg. 29-32

Independent Limited Assurance Report to Abu Dhabi Commercial Bank P.J.S.C

We have been engaged by Abu Dhabi Commercial Bank P.J.S.C ("ADCB" or the "Bank") to perform a limited assurance engagement on the selected sustainability metrics detailed in Table 1 ("Selected Information"), which are presented within the 2025 ADCB ESG Report (the "Report"). The Selected Information comprises selected sustainability metrics for the year ended 31 December 2025 and Scope 3 Financed GHG emissions for the years ended 31 December 2023 and 31 December 2024, prepared in accordance with the Abu Dhabi Commercial Bank P.J.S.C Basis of Reporting (the "Applicable Criteria").

Use of report

This report is made to Abu Dhabi Commercial Bank P.J.S.C, in accordance with the International Standard on Assurance Engagements 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, ("ISAE 3000 (Revised)"), the International Standard on Assurance Engagements 3410 "Assurance Engagements on Greenhouse Gas Statements" ("ISAE 3410"), issued by the International Auditing and Assurance Standards Board (IAASB) and our agreed terms of engagement. Our work has been undertaken so that we might state to ADCB those matters we are required to state to them in this limited assurance report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than ADCB for our work, for this report, or for the conclusion we have formed.

Our conclusion

Based on our work as described in this report nothing has come to our attention that causes us to believe that the Selected Information, as set out in the Table 1 has not been prepared, in all material respects, in accordance with the Basis of Reporting as disclosed on pages 29 to 32 ("Aligning portfolios and reducing financed emissions" section) and 107 to 109 ("Data and Assurance" section) of the 2025 ESG Report.

Respective responsibilities

ADCB is responsible for:

- Establishing the Basis of Reporting for preparing the Selected Information;
- The preparation of the calculation for the Selected Information in accordance with the Basis of Reporting;
- Ensuring that the information provided under the Selected Information is properly prepared in accordance with the Basis of Reporting and confirming the measurement or evaluation of the Selected Information against the applicable Basis of Reporting;
- Designing, implementing and maintaining internal processes and controls over the Selected Information that are relevant to the preparation of the Selected Information to ensure the information is free from material misstatement, whether due to fraud or error; and
- Calculating and reporting the Selected Information in accordance with the Basis of Reporting.

Our responsibility is to express a conclusion on the Selected Information based on our procedures. We conducted our engagement in accordance with ISAE 3000 (Revised) and ISAE 3410, in order to state whether anything had come to our attention that causes us to believe that the Selected Information has not been prepared, in all material respects, in accordance with the Basis of Reporting as defined within the 2025 ADCB ESG Report. The Selected Information comprises selected sustainability metrics for the year ended 31 December 2025 and Scope 3 Financed GHG emissions for the years ended 31 December 2023 and 31 December 2024. In conducting our limited assurance engagement, we have complied with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code).

Our procedures consisted primarily of:

- Understanding the roles and responsibilities involved in the preparation, governance, and oversight of the Selected Information, and assessing its preparation against the Basis of Reporting.
- Conducting enquiries with management to understand how the Basis of Reporting has been applied in preparing the Selected Information.
- Assessing the compilation of the Basis of Reporting against market practices.
- Reviewing and evaluating the Basis of Reporting for measurement and reporting of each selected Sustainability metric, comparing it to the actual calculations performed by ADCB to support the Selected Information shown in Table 1.
- Verifying the selected Sustainability metrics against ADCB internal calculations and supporting documentation.
- Assessing the availability and quality of evidence provided to support the Selected Information.
- Confirming the Selected Information against ADCB internal calculations and supporting documentation.
- Accumulating misstatements and control deficiencies identified and assessing whether material.

Basis of reporting

The Basis of Reporting is published within the 2025 ESG Report pages 29 to 32 (“Aligning portfolios and reducing financed emissions” section) and on pages 107 - 109 (“Data and Assurance” section).

The self-defined applicable criteria; the nature of the Selected Information; and absence of consistent external standards allow for different, but acceptable, measurement methodologies to be adopted within the organisation. The adopted measurement methodologies may also impact comparability of the Selected Information reported from year to year within an organisation as methodologies develop.

Inherent limitations

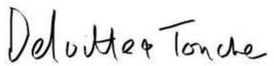
Our engagement provides limited assurance as defined in ISAE 3000 (Revised) and ISAE 3410. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Inherent limitations exist in all assurance engagements due to the selective enquiry of the information being examined. Therefore fraud, error or non-compliance may occur and not be detected. Our work does not involve testing the operating effectiveness of controls over the underlying data, nor have we sought to review systems and controls beyond those relevant to the Selected Information.

Our independence and competence

We complied with Deloitte’s independence policies, which address and, in certain cases, exceed the requirements of the International Ethics Standards Board for Accountants’ Code of Ethics for Professional Accountants in their role as independent auditors, and in particular preclude us from taking financial, commercial, governance and ownership positions which might affect, or be perceived to affect, our independence and impartiality, and from any involvement in the preparation of the report.

We applied the International Standard on Quality Management (“ISQM”) 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements. Accordingly, we maintained a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



Deloitte & Touche (M.E.)

Abu Dhabi – United Arab Emirates
3 June 2026

Glossary of key ESG terms used in our disclosures

AAML: ADCB Asset Management Limited

ABC: Anti-Bribery and Corruption

AHB: Al Hilal Bank PJSC: ADCB's Islamic banking subsidiary in the UAE

ADCB: Abu Dhabi Commercial Bank PJSC

ADCB Group/Group: Abu Dhabi Commercial Bank PJSC group of entities which includes the Bank, any subsidiary of the Bank, and any affiliate and joint venture of the Bank

ADGM: Abu Dhabi Global Market

ADX: Abu Dhabi Securities Exchange

AI: Artificial Intelligence

AML: Anti-Money Laundering

BAC: Board Audit Committee

BEC: Board Executive Committee

BRC: Board Risk Committee

CASA: Current and Savings Accounts

CBUAE: Central Bank of the United Arab Emirates

CFT: Combating the Financing of Terrorism

CIBG: Corporate & Investment Banking Group

CO_2: Carbon dioxide

CSR: Corporate Social Responsibility

DCM: Debt Capital Markets

E&S: Environmental and Social

ECL: Expected Credit Loss

EIF: Emirates Institute of Finance

EGLP: Eligible Green Loan Portfolio

ESG: Environmental, Social and Governance

ESRM: Environmental and Social Risk Management

FATF: Financial Action Task Force

GCEO: Group Chief Executive Officer

GCFO: Group Chief Financial Officer

GHG: Greenhouse Gas

GRI: Global Reporting Initiative

GSC: Group Sustainability Committee

HQLA: High Quality Liquid Assets

HR: Human Resources

HSA: Higher Shari'ah Authority

IA: Information Assurance

ICAAP: Internal Capital Adequacy Assessment Process

ICMA: International Capital Market Association

ICV: In-Country Value

IFRS: International Financial Reporting Standards

IR: The ADCB Investor Relations Department

KPI: Key Performance Indicator

KRI: Key Risk Indicator

LGD: Loss Given Default

LMA: Loan Market Association

LMI: Line Manager Index

MEC: Management Executive Committee

NCHRGC: Board Nomination, Compensation, Human Resources, and Governance Committee

NDC: Nationally Determined Contribution

NGFS: Network for Greening the Financial System

NPS: Net Promoter Score

OHI: Organisational Health Index

PCAF: Partnership for Carbon Accounting Financials

PD: Probability of Default

RAS: Risk Appetite Statement

RBG: Retail Banking Group

RCSA: Risk & Control Self-Assessment

RMC: Risk Management Committee

SASB: Sustainability Accounting Standards Board

SDG: Sustainable Development Goals

SFWG: Sustainable Finance Working Group

SME: Small and Medium-sized Enterprise

SSP: Shared Socioeconomic Pathways

TCFD: Task Force on Climate-related Financial Disclosures

TIG: Treasury & Investments Group

UBF: UAE Banks Federation

UNEPFI: United Nations Environment Program Finance Initiative

Abu Dhabi Commercial Bank

Sheikh Zayed Bin Sultan Street

PO Box: 939, Abu Dhabi UAE

adcb.com/esg