Anti-Bribery and Corruption Disclosure

Our Commitment

Zand Bank PJSC is committed to the highest standards of integrity, transparency, and ethical conduct in all of its activities. We maintain a **zero-tolerance approach** to bribery and corruption.

No director, officer, employee, contractor, consultant, agent, intermediary, vendor, supplier, business partner, or any other person acting for or on behalf of Zand Bank may, under any circumstances, offer, promise, give, request, solicit, or accept any bribe, facilitation payment, kickback, or other improper advantage, whether directly or indirectly.

This commitment applies across all of Zand Bank's business activities and relationships, including banking services, virtual asset-related activities, procurement, outsourcing, third-party engagements, and dealings with public officials and private counterparties.

Scope

This approach applies to:

- all Board members, officers, and employees;
- temporary staff, secondees, trainees, interns, and outsourced personnel;
- consultants, contractors, and third-party representatives;
- agents, intermediaries, vendors, suppliers, and business partners; and
- subsidiaries, affiliates, and group companies, where applicable.

What We Prohibit

Zand Bank strictly prohibits:

- bribery in any form;
- corruption and abuse of entrusted power for personal or business benefit;
- facilitation payments, including unofficial payments intended to expedite routine actions;
- direct or indirect improper payments made through third parties or intermediaries;
- gifts, hospitality, entertainment, donations, favors, employment opportunities, discounts, or benefits intended to improperly influence a decision or obtain an unfair advantage;
- accepting any payment, gift, or hospitality where there is knowledge or suspicion that it is intended to secure improper treatment or a business advantage; and
- retaliation against anyone who refuses to participate in bribery or who raises a concern in good faith.

Gifts and Hospitality

Zand Bank maintains controls over gifts, entertainment, and hospitality to prevent actual or perceived bribery or conflicts of interest.

In line with our internal standards:

- cash and cash equivalents are prohibited;
- gifts or hospitality must never be offered or accepted in exchange for influence, business advantage, or favorable treatment;
- facilitation payments are prohibited; and
- all relevant gifts and hospitality must be recorded in the Bank's official register in accordance with internal policy requirements.

Third Parties and Vendors

Zand Bank expects all third parties engaged with or on behalf of the Bank to comply with anti-bribery and anti-corruption standards and all applicable legal and regulatory requirements.

Third-party relationships are subject to appropriate due diligence, approval processes, contractual controls, and ongoing monitoring. The Bank does not permit any employee or representative to promote, select, or engage a third party for personal benefit or in circumstances that create an actual or perceived conflict of interest.

Reporting Concerns

Zand Bank encourages employees, clients, vendors, partners, and members of the public to report any suspected or actual bribery, corruption, unethical conduct, or related misconduct.

Reports may be made through the following confidential channels:

- **Email:** whistleblowing@zand.ae
- **Website whistleblowing channel / webform:** available through Zand Bank's whistleblowing procedure page
- **Telephone hotline:** available through the published whistleblowing procedure
- **Other internal escalation channels:** including management, Human Resources, Compliance, or escalation to senior leadership where appropriate

Anonymous reports are permitted where allowed by applicable law and process.

Confidentiality and Protection

Zand Bank treats reports seriously and with strict confidentiality. We protect, to the fullest extent possible under applicable law, the identity of any individual who raises a concern in good faith.

Zand Bank strictly prohibits retaliation, intimidation, discrimination, victimisation, or reprisal against any person who:

- reports a concern in good faith;
- refuses to participate in bribery or corruption; or
- assists with an investigation or inquiry.

Investigation and Regulatory Escalation

All suspected or actual breaches of anti-bribery and corruption requirements are reviewed and investigated in a confidential, fair, and independent manner under the Bank's governance framework.

Where required by applicable law or regulation, Zand Bank will report relevant matters to competent authorities and regulators.

Governance and Oversight

The Bank's Anti-Bribery and Corruption framework is supported through governance, internal controls, staff training, record-keeping, and oversight by the appropriate control functions and senior management.

Zand Bank reviews its Anti-Bribery and Corruption arrangements periodically and updates them as required to reflect legal, regulatory, and business developments.

Training and Awareness

Relevant employees, Board members, and applicable third parties are required to receive anti-bribery and corruption training and are expected to understand and comply with the Bank's standards and reporting obligations.

Public Availability

This disclosure is published to communicate Zand Bank's zero-tolerance approach to bribery and corruption and to support transparency with clients, counterparties, third parties, and the public.

For more information, please contact:

- **Compliance / MLRO:** MLRO@zand.ae
- **Human Resources:** hrservices@zand.ae

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