Group Human Resources Management Policy

September 2026

Version 2.0

Document History

Version	Effective Date	Author / Owner	Summary of Changes	Approved By
1.0	March 2022	Group Human Resources	Initial policy issued	CHRO
2.0	September 2026	Group Human Resources	Comprehensive review and restructuring	CHRO

Glossary of Acronyms

Acronym	Full Form
D&I	Diversity and Inclusion
DEI	Diversity, Equity, and Inclusion
ERIP	Employee Referral Incentive Program
ESG	Environmental, Social, and Governance
GHR	Group Human Resources
HQ	Headquarter
IHE	In-House Engagement
ILO	International Labor Organization
ISO	International Organization for Standardization
MCT	Most Collaborative Team
MVP	Most Valuable Player
STNA	Strategic Training Needs Analysis
TLC	Transcendence Leader Coach
TNA	Training Needs Assessment

Contents

Purpose

This Policy sets out NBK Group's commitments, governance and management approach for material human capital matters. It is intended for public disclosure and should be read together with NBK's annual Sustainability Report, which provides quantitative performance data, reporting boundaries, methodologies and year-on-year progress.

Group Human Resources is responsible for implementing this Policy, maintaining support procedures, monitoring performance, and escalating material workforce risks. Relevant management committees review performance, emerging risks, and corrective actions within their mandates. Material human capital matters are reported to Bank leadership and, where appropriate, to the Board or a designated Board committee. This Policy is reviewed at least every two years, or earlier when required by changes in law, strategy, risk exposure, or stakeholder expectations.

This Policy applies to NBK Group employees and describes the principles, governance, and management approaches used to address material human capital matters. Unless otherwise stated, quantitative workforce information, reporting boundaries, definitions, and the reporting period are provided in NBK's annual Sustainability Report. Requirements may vary by jurisdiction, and local policies may provide additional details were permitted by applicable law.

Introduction

National Bank of Kuwait (NBK) Group regards its employees as a strategic asset and is committed to responsible employment, effective workforce management and continuous employee development. This Human Resources Management Policy supports the "Capitalizing on Our Capabilities" pillar of NBK's Group ESG strategy, alongside Governance for Resilience, Responsible Banking and Investing in Our Communities. It establishes the principles through which NBK manages material workforce risks and opportunities and integrates human capital considerations into Bank's wider sustainability governance.

NBK works to engage and motivate employees, promote labor and human rights, and develop our employees. This is undertaken through our comprehensive and responsible human resources policies and procedures, which protect employee rights, provide a workplace free from any form of harassment, promote diversity, equity and inclusion, recruit and retain excellent talent, provide fair and competitive compensation commensurate with each job or task at hand, advance occupational safety, health and wellbeing, and build a responsible work culture that encourages ethical behavior and guides employees through formal procedures to deal with complaints and grievances.

1. Human Rights

Protection of human rights may be the most basic and fundamental element of human resource management. NBK is committed to adhering to all tenets of the basic Universal Declaration of Human Rights in both our internal operations and all projects in which we invest. All clients are expected to respect and promote human rights. NBK's commitment to protect Human Rights goes beyond compliance, to a commitment to do what is right to the extent possible within the law. NBK is committed to what we view as our corporate responsibility to respect human rights and will not engage in any relationships or activities when there is clear evidence of ongoing human rights violations or tolerate any human rights violations in our global operations. NBK respects internationally recognized human rights in its operations and seeks to avoid causing or contributing to adverse human rights impacts through its business activities. The Bank identifies and assesses relevant human rights risks, integrates findings into decision-making, tracks the effectiveness of its responses, and provides or cooperates in remediation where appropriate. Employees and other affected stakeholders may raise concerns through available grievance and whistleblowing channels without retaliation. Additional information on NBK's commitments and management approach is provided in the NBK Human Rights Statement, which is reviewed at least every two years or earlier when material changes in risk, law, or governance occur.

2. Non-Discrimination, Diversity, Equity & Inclusion

NBK is committed to support employees by offering equal and fair opportunities without discrimination of gender, race, color, nationality, religion, political affiliation, or any other status (e.g., age, disability) in all of the Bank's practices. This includes but is not limited to recruitment, hiring, placement, promotion, transfer, termination of employment, training, and compensation and benefits along with all other terms and conditions of employment. NBK is focused on cultivating an environment built around diversity, equity, and inclusion where everyone feels valued and acknowledged.

This commitment is governed by NBK's Group-wide Diversity and Inclusion Council, established to provide oversight, accountability, and strategic integration of D&I priorities across the organization. The Council is responsible for setting forward targets against these baselines and reporting progress to Group Human Resources and, at least annually, to the Board. NBK further commits to conducting a periodic equal-pay analysis across gender and nationality lines, with findings and any remediation reported to the Diversity and Inclusion Council and reflected in the Bank's human capital reporting.

3. Labor Rights

NBK abides by the core International Labor Organization (ILO) labor standards and is committed to employees' legal and human rights with respect to labor management relations, including but not limited to labor law and worker rights in all jurisdictions in which we operate, no child labor, no slave labor or human trafficking, freedom of association, collective bargaining, and all the elements covered in our human rights policy statement.

NBK assesses labor-management risks with regard to applicable law, workforce characteristics and operating geography. The Bank monitors relevant indicators, which may include employee turnover, absenteeism, engagement, grievances, disciplinary matters and labor-related disputes. Material trends and concerns are reviewed by accountable management, and corrective actions are tracked to completion. Employees may raise concerns without retaliation through established grievance and whistleblowing channels.

4. Compensation and Benefits

4.1 Compensation Policy

The compensation policy at NBK aims to:

- Maintain a compensation program that will attract and retain highly qualified employees at all levels of responsibility.
- Ensure offers of competitive pay against the external market while maintaining internal equity.
- Provide flexibility to reward employees based on individual performance and contribution to the achievement of the Bank's goals.
- Compensation is defined and delivered in a fair and equitable manner across all jobs.

4.2 Employee Benefits and Allowances

NBK has established a variety of employee benefits and allowances designed to assist employees and their eligible dependents in meeting their specific needs. Some of the benefits and allowances offered are based on employee progression, job function and grade/managerial level:

4.2.1 Employee Benefits

- Temporary Living Expenses – only for employees recruited from abroad
- Life Insurance
- Schooling Assistance
- Medical Insurance
- Interest-Free Loans
- Credit Facilities

- Special Bonus Based on Management Discretion
- NBK Key Employees Phantom Shares Option Plan
- Employee Referral Incentive Program (ERIP)
- Salary in Advance (under special circumstances and as per NBK's internal policy)
- Annual Paid Leave
- Sick Leave
- Compassionate Leave
- Hajj Leave
- Maternity Leave
- Unpaid leave
- Employee Study Leave
- Paternity leave
- Wellbeing leave
- Flexible working hours

4.2.2 Employee Allowances - Subject to NBK's internal policies:

- Shift Allowance
- Transportation Allowance
- Remote Branches Transportation Allowance
- Teller Allowance
- Headphone Allowance
- Ticket Allowance
- Parking allowance

4.3 Employee Secondment

Seconding of employees from Kuwait to overseas Branches may occur in collaboration with employees' needs and preferences in order to provide them with career development opportunities. This allows them to gain new skills and experience to expand their knowledge and expertise.

4.4 Performance Management and Employee Career Progression

At NBK, Performance Management is a continuous process designed to drive performance, support employee growth, and strengthen business outcomes. By aligning individual goals with the Bank's strategy, encouraging regular feedback and meaningful performance conversations, and focusing on development throughout the year, employees are empowered to perform at their best. The process also provides a fair and consistent approach to evaluating performance, recognizing achievements, identifying development needs, and supporting career progression based on merit.

NBK fosters the advancement of our employees by encouraging and rewarding outstanding performance. Staff are eligible for promotions to higher positions and/or grades based on business needs, their job responsibilities, performance and required competency levels. Employees will be evaluated at periodic intervals based on their performance and job description. All promotions are considered as per management guidelines and promotion criteria. Further, NBK offers professional development and mentoring programs to improve employee qualifications.

NBK has a comprehensive Performance Management Process applicable to all employees, which links NBK's Strategy, Resources, Processes and Actions. This process assists the employees in developing their performance, enabling them to contribute to the achievement of the Bank's goals and gain personal and professional satisfaction. Additionally, NBK strives to eliminate gender, racial, and other forms of bias in performance assessment.

4.5 Annual Merit Increase

Merit increases are applicable for all employees and distributed according to each employee's performance level (Significantly Exceeding Expectation - Exceeding Expectation - Meeting Expectation) and following the annual review process.

4.6 Salary Adjustment

Employees are eligible for a salary adjustment to compensate for the following based on NBK policy:

- Change in educational qualification (MBA or Masters degree directly related to the employee's job responsibilities and duly verified by the Ministry of Higher Education)
- Change in job description and/ or job responsibilities for staff selected through IHE and confirmed in their new position

4.7 Annual Leave

Full-time employees are entitled to a minimum of 30 working days of paid annual leave, or such other entitlement as specified in their employment contracts, after completing the probation period. Annual leave requests are subject to management approval. In line with applicable requirements, employees are required to take at least two consecutive weeks of paid leave each year, and unused leave may be carried forward within the limits established by applicable law and NBK policy.

4.8 Maternity/Paternity Leave

Eligible employees receive maternity or paternity leave in accordance with applicable law, their employment terms and NBK policy. These leave arrangements support employees during childbirth and the early stages of family care. Eligibility, duration, pay and required documentation are determined by the employing entity and applicable jurisdiction, and employees submit requests through the established Human Resources process.

5. Employee and Family Safety, Health & Wellbeing

At NBK, we care about the safety, health and wellbeing of our people and their families by providing programs to promote and monitor occupational safety and offering benefits, as described below. Further, we recognize that the safety and wellbeing of workers and their family's impact absenteeism and turnover, disruption to operations, cost of operations and insurance premiums, hence we strive to create a family-friendly work environment.

5.1 Occupational Safety

While occupational safety risks are generally less prevalent in the financial sector than in many other industries, NBK remains committed to providing a safe and healthy workplace and preventing hazardous conditions.
Common occupational hazards in banks are workplace violence in the form of emotionally (and occasionally physically violent interactions with customers or members of the public (ranging from irritation to bank robbery situations) or abusive colleagues or managers; repetitive strain injuries; and slips and falls. Other safety, health and wellbeing risks include exposure to germs and viruses, stress and performance pressure, harassment or discrimination, and accidents when commuting to work. NBK has programs and practices to address these hazards, promote safe and healthy practices, and work environment. Mental health and psychological safety is treated as a standing occupational-wellbeing priority, not only a downstream risk. Employees have access to confidential mental-health consultation through strategic partnerships with local clinics, and managers receive guidance on recognizing and responsibly escalating wellbeing concerns.

5.2 Life, Health, and Work Injury Insurance

NBK Medical Insurance and Life Insurance schemes cover all employees as follows:

5.2.1 Life Insurance

NBK's Group Life Insurance Policy pays 36 months' salary (basic salary + 15% + Grade Allowance if any) in the event of natural death and 72 months' salary (basic salary + 15% + Grade Allowance if any) in the event of accidental death. The proceeds are paid to the appointed heir(s).

5.2.2 Work-Related Injuries Insurance

NBK provides Work Injury Insurance coverage to employees in accordance with the applicable Kuwait Labor Law. The insurance covers death or bodily injury resulting from accidents occurring while employees are performing their duties or work for NBK.

The coverage also extends to accidents occurring during employees' direct commute between their usual place of residence and workplace, as well as while working overtime, attending training courses, or traveling on business trips within Kuwait or abroad, subject to the terms and conditions of the applicable insurance policy.

5.2.3 Medical Insurance

All employees and their direct family (spouse and two children up to the age of 23) are entitled to medical insurance coverage according to the NBK Medical Insurance Scheme.

5.3 Employee Wellbeing

5.3.1 NBK Clinic

To actively support the health and safety of our employees, the bank has set up a fully equipped medical clinic in NBK's Headquarters. Employees may access a range of on-site primary healthcare services, including consultations with a doctor, immediate assessment and care for common ailments and minor health concerns, basic health checks, and selected diagnostic services such as blood tests. Where further evaluation or specialist treatment is required, employees may be advised to seek appropriate external medical care.

NBK also regularly conducts campaigns and initiatives, including inviting external professionals to provide employees with consultations on mental health, stress and anxiety management. Employee health and wellbeing campaigns address topics such as family and heart health, mental health, nutrition, physical fitness, preventive screening, physiotherapy, breast cancer and diabetes awareness, blood donation, and digital learning challenges.

5.3.2 NBK Gym

The NBK Gym provides employees with convenient access to on-site fitness facilities that promote healthier lifestyles and overall wellbeing. The gym encourages regular physical activity, helping employees improve their physical health, reduce stress, increase energy levels, and support mental resilience.
By offering an accessible workplace fitness facility, NBK reinforces its commitment to preventive healthcare and employee wellness, creating an environment that enables employees to maintain a healthy work-life balance while enhancing productivity and long-term wellbeing.

5.3.3 NBK HQ Cafeteria

The cafeteria at NBK Headquarters provides a designated space for employees to take breaks and offers a variety of food choices, including healthy options. It also regularly hosts booths where local brands and companies can showcase and sell their products to employees. NBK seeks employee feedback through periodic surveys to identify opportunities to enhance the cafeteria experience, including suggestions for food choices, new vendors, promotional offers and employee discounts.

6. Our Culture

Our culture is built around a professional and positive environment where employees are respected and empowered and are expected to conform to appropriate legal, moral, ethical and professional standard of behavior and conduct. Employees are educated about and expected to follow NBK's Code of Conduct, Anti-Corruption and Bribery Policy, Anti-Money Laundering Policy, etc.

The Code of Business Ethics and Conduct applies to all employees regardless of position. Managers and supervisors are accountable for communicating its requirements, promoting ethical conduct, and ensuring that employees receive appropriate training and guidance. Compliance is reinforced through onboarding, periodic learning, management oversight, and disciplinary processes.

Employees are expected to avoid actual, potential or perceived conflicts between personal interests and the interests of NBK, and to disclose relevant conflicts through established channels. Employees must not offer, solicit or accept gifts, benefits or other advantages that could improperly influence, or appear to influence, business decisions. These requirements are supported by applicable conflicts-of-interest, anti-bribery, gifts and compliance procedures.

6.1 Staff Complaints

NBK is committed to a respectful workplace in which employee complaints are taken seriously and handled promptly, sensitively, impartially and confidentially. Employees have access to established channels for raising and escalating concerns, including alternatives where the direct reporting line is involved. Complaints are acknowledged within five business days and addressed within 30 business days, or the employee receives a documented progress update. Employees who raise a complaint, concern or whistleblowing report in good faith are protected from retaliation, disadvantage or reprisal.

Employees may raise a complaint with their Direct Manager. If the matter is not resolved, it is raised to a formal committee to review and provide recommendation as per Kuwait Labor Law guidelines and approved NBK Schedule of Penalties. Complaints will be acknowledged within five business days and addressed within 30 business days, or the employee will receive a documented progress update.

We have a clear escalation process as shown below, that allows any employee to escalate any complaint to the next level if they have been unable to obtain resolution at the lower level:
Direct Manager / Group Head → HR Employee Relations → Chief of Group Human Resources → Staff Complaint Committee.

6.2 Personal and Professional Behavior

Employees should perform the duties associated with their position to the best of their ability, diligently, impartially and conscientiously. Furthermore, all employees must always bear in mind that their personal conduct may affect the standing of NBK, or the way in which the public perceives NBK.
Employees should:

- Comply with legislative obligations and administrative policies;
- Protect personal, customer, employee and business information against loss, misuse, unauthorized access, modification or disclosure. Employees may access and use information only for authorized business purposes and on a need-to-know basis. They must comply with applicable privacy, information-security, records-management and confidentiality requirements and report suspected breaches through established channels;
- Strive to keep up to date with advances and changes in knowledge and the professional and ethical standards relevant to their areas of expertise;
- Treat all people with courtesy and sensitivity to their rights and provide all necessary and appropriate assistance;
- Not taking or seek to take improper advantage of any official information gained throughout their employment with NBK;
- Avoid any harassment or discrimination against employees in work practices on the grounds of gender, race (including color, ethnic background or national identity), marital status, disability, religious belief, age or other personal attributes.

6.3 Integrity and Inter-Personal Relationships

In their day-to-day dealings, all employees act in accordance with the principle of treating others, as they themselves would wish to be treated. In particular, employees should avoid:

- Impugning or commenting negatively on the integrity or character of colleagues;
- Making statements about employees that they know to be untrue or are incapable of substantiating.

7. Learning, Development & Capability Building

NBK offers a comprehensive range of internal and external learning programs designed to support employees' professional and personal growth throughout their careers. Through state-of-the-art learning facilities, experienced facilitators, and modern learning methodologies, employees have access to high-quality development experiences delivered through classroom learning, virtual sessions, e-learning, coaching, mentoring, certifications, and experiential learning opportunities.

To ensure learning investments are aligned with organizational needs, training requirements are identified through an annual Training Needs Assessment (TNA) process. This enables the Bank to proactively address capability gaps, develop future-ready skills, and maintain high professional standards in line with evolving industry expectations and market demands.

In addition, a Strategic Training Needs Analysis (STNA) is conducted in collaboration with business groups to align learning and development initiatives with each Group's strategic objectives, priorities, and future capability requirements. This targeted approach helps identify critical skill gaps and ensures that development opportunities are tailored to support business goals, enhance performance, and build the capabilities needed for long-term success.

Partnerships with leading local and international institutions further enhance learning opportunities by providing employees with access to globally recognized certifications, specialized banking programs, and industry-leading expertise.

NBK evaluates the effectiveness of its learning and talent programs using indicators such as participation, completion, learning hours, capability development, internal mobility, succession readiness and retention, as appropriate. Results are reviewed to identify gaps, improve program design and align future investment with strategic workforce needs. Relevant performance information and methodological notes are disclosed through NBK's annual reporting cycle.

7.1 New Recruits' Development Journey

At NBK, employee development begins from day one. All newly hired employees are required to attend a comprehensive onboarding and induction programs designed to familiarize them with the Bank's culture, values, policies, systems, products, and services. The program equips new colleagues with the knowledge and tools needed to integrate successfully into the organization and perform their roles effectively on both a junior and senior level.

The induction journey includes mandatory learning modules covering topics such as:

- Code of Conduct
- Compliance and Regulatory Requirements
- Human Resources Policies
- Information Security
- Customer Service Excellence
- Workplace Professionalism
- Essential Soft Skills, based off roles

This structured approach helps ensure a smooth transition into the Bank while reinforcing NBK's commitment to professionalism, ethical conduct, and service excellence.

All NBK employees are encouraged to actively participate in learning opportunities throughout the year to continuously develop their professional and personal capabilities. Employees have access to a wide variety of development programs covering banking, leadership, digital transformation, risk management, compliance, customer experience, business operations, and other specialized areas aligned to their roles and career aspirations.

These programs are delivered through a combination of internal expertise, external training providers, professional bodies, and internationally recognized institutions, ensuring employees benefit from current best practices and industry-leading knowledge. By investing in continuous learning, NBK aims to build a highly skilled, future-ready workforce capable of delivering exceptional performance, driving innovation, and supporting the Bank's long-term success.

7.2 NBK Learning Hub

The NBK Learning Hub is the Bank's centralized learning platform, designed to provide employees with seamless access to development opportunities that support their development. The platform offers a diverse range of learning resources, courses, and learning pathways. By bringing learning into a single, accessible platform, the NBK Learning Hub empowers employees to take ownership of their development and continuously build the skills required to succeed in a rapidly evolving banking environment. More than just a learning management system, the NBK Learning Hub serves as a key enabler of the Bank's talent development strategy by fostering a culture of continuous learning, supporting career growth, enhancing professional capabilities, and aligning employee development with NBK's strategic priorities. Through personalized learning experiences and easy access to high-quality content, the NBK Learning Hub helps employees remain future-ready while contributing to both individual and organizational success.

7.3 Leadership Programs

7.3.1 Middle Management Program

The Middle Management Program is designed to develop and strengthen the leadership and management capabilities of both current and emerging middle managers. The program equips participants with the skills and mindset required to effectively lead teams, drive performance, navigate change, and contribute to the achievement of NBK's strategic objectives. Through a structured blend of learning, practical application, and development opportunities, participants enhance their leadership effectiveness, communication, decision-making, stakeholder management, and people leadership capabilities. The program also fosters greater self-awareness, accountability, and business acumen, enabling managers to lead with confidence and create a positive impact within their teams and the wider organization. By investing in the development of its middle manager, NBK continues to build a strong leadership pipeline and ensure sustainable organizational success.

7.3.2 Transcendence Leadership Coach

The Transcendence Leader Coach (TLC) Program is designed to strengthen coaching capabilities among NBK's senior leaders and foster a coaching culture across the organization. The program is designed to equip leaders with the skills required to effectively coach, develop, and empower their teams, enabling them to unlock employee potential, enhance performance, and drive sustainable growth. Unlike traditional leadership programs, TLC places significant emphasis on practical application, ensuring that participants apply coaching techniques in real workplace settings throughout their development journey.

The TLC journey is delivered through three progressive phases:

- Performance Excellence
- Coaching Skills
- Advanced Coaching

This phased approach was intentionally designed to maximize learning transfer and long-term behavioral change. Between each phase, participants are provided with dedicated time to practice coaching conversations, apply new techniques, and support the development of their selected coaches. This experiential learning model allows participants to reinforce classroom learning through practical application while receiving continuous feedback and guidance. Through the TLC Program, NBK aims to build a strong cadre of leader-coaches who can inspire, develop, and elevate the performance of their teams while contributing to a culture of continuous learning, growth, and high performance across the Bank.

7.3.3 Executive Development Programs

As part of NBK's commitment to developing strong and future-ready leaders, customized leadership development programs are offered to support the growth of senior leaders across the organization. These programs are designed to address the evolving leadership challenges, strategic priorities, and business requirements of the Bank while strengthening the capabilities needed to lead effectively in a dynamic environment.

The programs focus on leadership and strategy and to enhance participants' strategic thinking, leadership effectiveness, decision-making, change leadership, and ability to execute organizational priorities. Through executive-level learning experiences, practical application, and strategic discussions, participants deepen their understanding of leadership in a complex business environment and develop the skills required to drive sustainable organizational success.

8. Talent Management

NBK is committed to attracting, developing, engaging, and retaining talented employees to ensure a sustainable pipeline of skills and leadership capabilities that support the Bank's strategic objectives.

Through its talent management practices, NBK seeks to identify high-performing and high-potential employees, provide opportunities for professional growth and career progression, and strengthen organizational capability through succession planning, leadership development, mentoring, coaching, and targeted development initiatives.

In support of this commitment, NBK collaborates with leading local, regional, and international educational institutions and professional partners to provide learning and development opportunities that enhance employee capabilities and prepare talent for future organizational needs.

Our Talent Management approach is guided by NBK's Employee Value Proposition (EVP), which defines the unique set of benefits and opportunities offered to employees in exchange for their skills, capabilities, and commitment.

8.1 NBK Academy

Established in 2008, the NBK Banking Academy serves as a key talent pipeline for the Bank, supporting the attraction and development of promising Kuwaiti graduates. The program equips participants with the technical, professional, and behavioral competencies required to succeed in the banking industry while fostering a strong foundation for long-term career growth within NBK.

The Academy contributes to the Bank's talent management strategy by developing future talent and supporting workforce sustainability through structured learning and practical business exposure.

8.1.1 Business Development

The Academy connects participants with NBK business teams through practical assignments and structured engagement. These interactions give participants exposure to the Bank's operations and priorities while enabling business teams to contribute to talent development and assess ideas relevant to their areas.

8.1.2 Market Awareness & Brand Recognition

The Academy supports awareness of NBK's graduate-development activities through participant engagement, external communications and program visibility. This reinforces the Bank's position as an employer that invests in early-career talent and contributes to skills development in Kuwait.

8.1.3 Education / Knowledge Transfer

Participants receive mentoring and guidance throughout idea development, from initial concept through final delivery. The process facilitates knowledge transfer between participants and coaches and develops practical capabilities in analysis, presentation, influencing and coaching. It also supports a broader culture of knowledge sharing and employee development within NBK.

8.1.4 Future Recruitment / Business Selection

The Academy provides NBK business teams with structured opportunities to observe participants' capabilities, interests and performance. This supports talent identification and informs recruitment and placement decisions in accordance with the Bank's established selection processes. Participants also gain a clearer understanding of potential career paths and role requirements within NBK.

8.2 NBK Tech Academy

Launched in 2023, the NBK Tech Academy is a strategic talent development initiative designed to build and strengthen technology capabilities within the Bank. The Academy supports NBK's digital transformation objectives by attracting, developing, and empowering talent in key technology disciplines.

Through structured learning, practical experience, and specialized development opportunities, participants enhance their technical expertise and professional competencies, enabling them to contribute effectively to the Bank's evolving technology landscape. The Academy supports NBK's talent management strategy by developing future-ready talent and strengthening the Bank's technology talent pipeline.

8.3 NBK Highfliers Program

The NBK Highfliers Program is a flagship leadership development initiative designed to identify, develop, and prepare high-performing employees with strong leadership potential for future leadership roles within the Bank.

Delivered in collaboration with leading academic and professional institutions, the program focuses on strengthening participants' strategic thinking, leadership effectiveness, business acumen, and decision-making capabilities. Through a combination of structured learning, practical experiences, mentoring, and executive development opportunities, participants are equipped to lead in a dynamic and evolving banking environment.

The program supports NBK's talent management strategy by building a sustainable leadership pipeline and enhancing organizational readiness for future business needs.

8.4 NBK RISE

NBK RISE is a dedicated leadership development initiative aimed at advancing and empowering female talent across the Bank. The program supports NBK's commitment to fostering an inclusive workplace, strengthening gender diversity, and increasing the representation of women in leadership positions.

Through targeted development opportunities, mentoring, networking, and leadership-focused learning, the program equips participants with the skills, confidence, and experiences needed to accelerate their career growth and prepare for expanded leadership responsibilities.

NBK RISE contributes to the Bank's talent management strategy by developing future women leaders and supporting a diverse and sustainable leadership pipeline.

8.5 NBK Mentoring Program

The NBK Mentoring Program is designed to support employee development through structured mentoring relationships that facilitate knowledge sharing, professional growth, and leadership development. The program fosters a culture of continuous learning by connecting employees with experienced professionals who provide guidance, insights, and support. Through mentoring partnerships, participants gain valuable opportunities to enhance their professional capabilities, expand their networks, and navigate career development opportunities. Mentors contribute by sharing their expertise, experiences, and perspectives, while also strengthening their own leadership, coaching, and people development skills.
The program supports NBK's talent management strategy by promoting knowledge transfer, strengthening employee engagement.

8.6 Most Valuable Team Players

The Most Valuable Team Players initiative recognizes employees and teams who demonstrate exceptional collaboration, teamwork, and contribution to the achievement of business objectives. Through a peer-driven recognition approach, employees have the opportunity to acknowledge colleagues and teams who consistently exemplify NBK's values and foster a positive and collaborative work environment.

Selected employees and teams are recognized by the Bank's leadership for their outstanding contributions, reinforcing a culture of appreciation, engagement, and high performance across NBK.

The initiative supports NBK's talent management strategy by promoting employee engagement, strengthening collaboration, and recognizing behaviors that contribute to organizational success.

9. Communication with Group Human Resources (GHR)

HR requests at NBK are only a click away. Self-Service Human Resources (SSHR) is an automated HR system within NBK that allows employees to perform all their HR-related processes and transactions on the self-service website. Any victim of harassment can directly call the Head of Security department in the Bank. For any whistleblowing incident, the Group Human Resources will conduct or assist in the investigation and human resources concerns and results are reported to the Chairman of the Board through the Board Secretary.

Whistleblowers are protected from retaliation under the non-retaliation commitment in Section 6.1. Where the matter concerns diversity, equity, or inclusion, findings are additionally routed to the Diversity and Inclusion Council for awareness and, where relevant, policy action.

10. Human Capital Reporting and Disclosure

NBK's Human Resources function is certified to ISO 30414:2025 (Human Resource Management — Requirements and Recommendations for Human Capital Reporting and Disclosure), covering talent acquisition and recruitment, human capital reporting and disclosure, learning and development, competence management, performance management, employee relations, compensation and benefits, and HR governance.

NBK establishes time-bound human capital objectives and monitors progress through defined indicators. Objectives may address workforce diversity, employee engagement, learning and development, talent retention, pay equity, occupational health and safety, and grievance management. Progress, significant variances, and corrective actions are reviewed by the accountable governance bodies and disclosed publicly where the information is material and suitable for external reporting.

NBK maintains documented processes for collecting, validating, and reviewing human capital data to support the accuracy, completeness, consistency, and reliability of reported information. Where applicable, disclosures use consistent definitions, calculation methodologies, and reporting boundaries to enable meaningful year-on-year comparisons.

Any material restatements, corrections, estimates, or changes in scope, definitions, or methodology will be clearly identified and explained. Their impact on reported trends and comparability will also be quantified where feasible. Reported metrics are supported by underlying records and management review processes, providing decision-useful information for internal oversight and external stakeholders.

Where data limitations, gaps, assumptions, or estimation methods may affect the interpretation of results, NBK will disclose their nature and significance, together with any actions being taken to improve data quality in future reporting periods.

11. References

11.1 Internal Documents

- Employee Handbook
- Employee Code of Conduct
- Group Human Resources Policies
  - Benefits and Rewards Policy
  - Talent Acquisition Policy
  - Leaves Policy
  - Manpower Planning Policy
  - Performance Management Policy
  - Staff Compliant, Grievance and Non-Retaliation Policy
  - Termination and Disciplinary Action Policy
  - Learning and Development Policy
  - Talent Management Policy
  - Secondment Policy

11.2 External documents

- NBK Annual Reports
- NBK Annual Sustainability Reports
- Employee Grievance Policy Statement
- Human Rights Statement
- Whistleblowing Policy
- NBK Group DEI Commitment Statement