

# Supplier Code of Conduct

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## 1. Overview

1. Alinma Bank (“Alinma”, “the Bank”, “we”, “our”), founded in 2006 and headquartered in Riyadh, Saudi Arabia, offers a diverse range of shariah-based banking and investment services across segments such as Retail Banking, Corporate Banking, Treasury, and Asset Management com& Brokerage.
2. Our commitment is deeply rooted in adhering to Sharia principles, ensuring regulatory compliance, and upholding our dedication to quality, integrity, transparency, and efficiency. These foundational values guide every aspect of our operations and ensure the trust and loyalty of our customers and stakeholders.
3. In line with the Saudi Vision 2030, Alinma Bank is dedicated to driving positive transformation and sustainable progress within the Kingdom of Saudi Arabia. Recognizing our pivotal role in molding the future of the Saudi society, we actively engage in responsible procurement and consistently endeavor to provide financial services that resonate with the highest professional standards for the communities we serve.
4. In the line with the Saudi Vision 2030, Alinma Bank is dedicated to driving positive transformation and sustainable progress within the Kingdom of Saudi Arabia. Recognizing our pivotal role in molding the future of the Saudi society, we actively engage in responsible procurement and consistently endeavor to provide financial services that resonate with the highest professional standards for the communities we serve.

## 2. Purpose

1. The purpose of this Supplier Code of Conduct (hereafter referred to as “the CoC”) is to ensure that organizations are aware of our core values, commitments, and additional standards of behavior that Alinma Bank requires and expects its suppliers to conform to when providing goods and services to Alinma Bank.
2. This CoC is not meant merely as a set of rules for specific situations, but also as a general guide. This CoC’s success depends on our suppliers using their good judgement – it sets a benchmark which suppliers are expected to respect.

## 1. Alinma Bank's Commitments on Sustainable Procurement

In line with Alinma Bank's overarching ESG objectives and Alinma's ESG Position Statements document, our commitment to fostering a sustainable, responsible business ecosystem, where all suppliers are treated with fairness and transparency, we lay down the following key commitments for sustainable procurement:

### 1.1 Supplier risk management

We commit to a comprehensive analysis of each supplier, which entails a tailored evaluation of their critical role in our product or service provision. This process will also include a specific analysis of any ESG risks or opportunities that are unique to each supplier, ensuring a focused and personalized approach in our supply chain management. To ensure our sustainability objectives are met consistently, we are intensifying the number of ESG audits performed on our local suppliers. We will ensure all our suppliers comply with our Supplier Code of Conduct, and we will monitor this compliance through regular audits and assessments.

### 1.2 Supplier engagement and development

We aim to identify and engage with local suppliers, particularly focusing on those that are critical to our operations and present opportunities to the Bank from an ESG risk management perspective. We will offer incentives to suppliers who demonstrate significant improvement in ESG metrics.

### 1.3 Support for SMEs, women-owned businesses and local suppliers

We are committed to enhancing financial inclusion by specially tailoring our services to meet the needs of SMEs, women-owned businesses and local suppliers. We will evolve our services continually to best support these sectors, focusing on creating avenues for their sustainable growth.

## 2. Applicability of and Adherence to the CoC

This CoC should be read if a supplier is considering responding to a request for proposal to provide goods and services to Alinma Bank. It is crucial for all suppliers to understand that they are unequivocally subject to the provisions of this CoC. The CoC is in alignment with the contractual obligations related to ESG and is intended to foster continual improvement of ESG performance and promoting best practices. The requirements set out in the CoC are not superseded once a contract has been entered into by a supplier with Alinma Bank. Suppliers are expected to continue to monitor at regular intervals their compliance with the requirements of the CoC. Any deviation from the CoC may result in repercussions ranging from a formal warning to the termination of the current contract to potential exclusion from future contracts and legal action.

- 2.1 Where there is a conflict between this CoC and any local legal and regulatory requirements or any contractual agreements with Alinma Bank, the local legal and regulatory requirements or the contractual agreement will govern.
- 2.2 Upon the start of an engagement with Alinma Bank, suppliers should provide a copy of this CoC to its personnel who will be involved in the supply of the goods and services. Personnel providing services may be required by Alinma Bank to complete training related to applicable law or regulation relevant to the role they are providing for Alinma Bank. Suppliers are expected to ensure that their personnel promptly undertake such training.

## 3. Compliance with Law

Alinma Bank will always require that its suppliers fully comply with all applicable laws and regulations in the countries in which they are operating. Where necessary, Alinma Bank expects its suppliers to respect this CoC within the context of customs and local law in the country in which they are operating. The law and regulations of the countries where the suppliers are operating must not conflict with Saudi laws and rules and regulations. Suppliers are expected to report promptly any concerns or suspected violations of applicable laws or regulations relating to Alinma Bank.

#### 4. Conflict of Interest

To maintain transparency and uphold the highest ethical standards, Alinma Bank emphasizes the importance of identifying and addressing potential conflicts of interest.

- 4.1 Supplier shall disclose to Alinma Bank any situation that may appear as a conflict of interest and shall disclose to all concerned parties any conflicts of interest that cannot be reasonably avoided.
- 4.2 In the event any circumstance arises where there exists a conflict of interest of any kind involving a party or any officer, employee, associate, affiliate, et cetera, suppliers and Alinma Bank shall discuss mutually such fact so that both parties will be able to address and resolve such conflict of interest the soonest possible time.

#### 5. Bribery and Corruption

In alignment with Section 9 of Alinma's ESG Position Statements document "published", titled Position Statement on Anti-Corruption, Alinma Bank expects all contracted suppliers and those seeking to offer goods or services to uphold the highest ethical standards. Adherence to these guidelines, as outlined below, is imperative. Suppliers must strictly adhere to all applicable rules and regulations concerning bribery and corruption, ensuring that they steer clear of unacceptable business practices.

- 5.1 Suppliers shall not, directly or indirectly, offer to any Alinma Bank staff money, goods, or services with the anticipation or expectation of a favorable decision, information, opinion, recommendation, vote, or any other benefit that can be classified as corruption.
- 5.2 Suppliers shall not, either directly or indirectly, offer, provide, or promise any form of gratification to any staff member of Alinma Bank for the benefit of, or at the direction or request of, any Alinma Bank staff.
- 5.3 Suppliers must promptly notify Alinma Bank's designated Point of Contact should any staff of Alinma Bank solicit, obtain, or attempt to obtain any form of gratification, whether for themselves or others.

## 6. Human Rights

Alinma Bank is committed to not just respecting human rights as required by the UN Guiding Principles on Business and Human Rights but also to improving human rights. All suppliers must ensure that the human rights of their personnel or people impacted by their business are fully respected and look for opportunities to improve such human rights.

- 6.1 Prohibit the use of all types of slavery including but not limited to forced and bonded labor, in accordance with the ILO Forced Labor Convention 1930 (No. 29) and the ILO Abolition of Forced Labor Convention 1957 (No. 105).
- 6.2 Prohibit and not engage in or support trafficking in human beings.
- 6.3 Permit their personnel the right to leave employment when they choose to do so.
- 6.4 Ensure that working hours are in compliance with local law and practice, in accordance with internationally recognised standards, and that any overtime is voluntary and paid.
- 6.5 Ensure that wages paid meet legal and industry minimums without any unauthorized deductions.
- 6.6 Ensure personnel are entitled to paid holiday.
- 6.7 Avoid employment contracts that do not mandate minimum hours of work each week.
- 6.8 Promote a workplace that is free from discrimination against its personnel on the basis of religious, social, gender identity, sexual orientation or ethnic grounds or any protected classes covered under international human rights standards and such other grounds as may be recognized under local law and free of harassment whether sexual, physical or mental.
- 6.9 Provide a safe and hygienic working environment.
- 6.10 Provide a fair and formal mechanism for personnel to raise any grievances regarding human rights violations to be raised, addressed and resolved without fear of retaliation.

6.11 Provide a formal whistleblowing mechanism for personnel to raise concerns of operational or business practices that may violate laws or supplier policies and for such concerns to be properly recorded and resolved without fear of retaliation.

Suppliers are expected to take appropriate steps and to implement adequate due diligence to ensure that respect for human rights is respected in their own supply chain and provide information to Alinma Bank as requested to allow Alinma Bank to assess such steps taken.

## 7. Diversity and Inclusion

Mutual respect is the foundation for developing trust and working in partnership. Alinma Bank does not tolerate disrespectful behavior, discrimination or harassment of any threatening, hostile or abusive behavior.

7.1 Alinma Bank considers that diversity amongst its employees and personnel from its suppliers enriches our interactions with clients, employees, investors and society at large.

7.2 Alinma Bank encourages its suppliers to ensure diversity of the personnel providing goods and services to Alinma Bank and expects each supplier to have policies in place to promote diversity and inclusion. Alinma Bank is keen to increase the diversity within both its suppliers and the supply chains of our suppliers.

7.3 Alinma Bank does not permit any discrimination based upon an individual's race, color, sex, national origin, ethnicity, age, religion, disability, marital status, pregnancy, gender identity and expression, citizenship or any other characteristic protected by law.

Where possible goods and services provided to Alinma Bank should be accessible to people with disabilities and Alinma Bank expects suppliers to undertake periodic reviews of their goods and services with the involvement of people with disabilities.

## 8. Sustainability

One of Alinma Bank's core values is sustainable performance. Alinma Bank is committed to considering the long-term effects of its activities and to generating sustainable value for our clients, employees, suppliers, investors and society at large. This means that Alinma Bank considers and assesses the direct and indirect economic aspects and impacts of our business decisions and we fully expect our suppliers to do the same.

Alinma Bank strives to increase the positive impact of its business decisions and to support a sustainable future for society and the environment. Alinma Bank monitors and mitigates the possible negative impacts and it applies reasonable due diligence processes to balance and to solve emerging conflicts of interest and ethical situations.

Alinma Bank maintains sound governance in line with laws and internal guidelines. Well-established sustainability frameworks, such as the United Nations Global Compact and the United Nations Sustainability Development Goals, provide guidance for our thinking and actions.

## 9. Confidentiality and Data Protection

To ensure the utmost security and integrity of both Bank and customer information, Alinma Bank underscores the paramount importance of confidentiality and stringent data protection.

- 9.1 Suppliers shall safeguard all Bank and customer information, ensuring that data, both in transit and at rest, is protected against unauthorized access, disclosure, alteration, and destruction.
- 9.2 Suppliers must strictly comply with all relevant data protection regulations and standards. This includes adhering to the Alinma Bank Personal Data Protection Policy available in the iSupplier portal and Alinma Bank shall take the necessary action such as sue the supplier in case of disclosing confidential information.



## 10. Management, Monitoring and Evaluation

- 10.1 In line with our responsible procurement commitments, Alinma Bank expects that suppliers have developed appropriate management systems related to the content of this CoC and any arrangements with Alinma Bank in order to ensure its objectives and requirements are met.
- 10.2 Alinma Bank expects that suppliers actively review, monitor, and modify their management processes and operations to ensure compliance.
- 10.3 Alinma Bank may from time to time conduct on-site visits to evaluate and inspect suppliers' operations, facilities, and offices and those of their sub-contractors to review progress and adherence.
- 10.4 Suppliers must at all times demonstrate compliance with the Alinma Bank's CoC on request.
- 10.5 Suppliers must, on request from time to time supply relevant documents and information including, but not limited to, supplier factory locations, supplier sub contractor names and locations, and results of historic audits.
- 10.6 Suppliers must ensure that documentation is retained to enable them to meet those requirements and demonstrate compliance with the Alinma Bank.

## 11. Raising Concerns and Whistleblowing

Alinma Bank expects its suppliers to uphold and promote our values and high professional standards, ensuring a commitment to act with integrity for the benefit of our stakeholders. The Bank is committed to creating an environment where concerns about any actual or suspected breach of this CoC or instances of misconduct can be raised by suppliers and sub-contractors.

11.1 For reports concerning violations committed by bank staff that pertain to fraud, embezzlement, financial/administrative corruption, or any form of unethical, illegal, or unprofessional conduct, Alinma Bank provides multiple channels:

- **Online:** Utilize the dedicated Report a Violation webpage to complete the Report a Violation form.
- **Email:** Direct communication can be established at WA@Alinma.com.
- **Phone:** The hotline is available both within the kingdom at 0112185311 and for international calls at +966112185311.
- **Postal Mail:** Written reports can be sent to Alinma Bank, Riyadh – Olaya 12244 – Alakaria complexes – 4th-floor office number 426 – Compliance & Anti-Financial crimes (Whistleblowing Officer).

### It is emphasized that:

- All submitted reports are treated with the highest level of confidentiality and are accessed solely by authorized bank personnel.
- Whistleblowers are expected to act in good faith, ensuring their reports are credible and are free from unproven rumors or baseless allegations.

11.2 Concerns specific to Alinma Bank's CoC may be communicated via the business line or project manager designated email address.

## 12. Definitions

The following terms are used within this document:

Abbreviation	Description
The Bank	Alinma Bank
CoC	Code of Conduct
ESG	Environmental, Social and Governance
SMEs	Small and Medium Enterprises