# Code of Conduct



## Contents

Code of Conduct	3
INTRODUCTION	3
LAWS & REGULATIONS	3
CORE ETHICAL VALUES	3
INTEGRITY	3
HONESTY	4
FAIRNESS	4
RESPONSIBILITY	4
COMPETENCE	4
TRUST	4
CORE PROFESSIONAL VALUES: BUSINESS PRACTICES	4
REGULATORY COMPLIANCE	4
CONFIDENTIALITY	5
TRANSPARENCY	5
RISK MANAGEMENT	5
ANTI-MONEY LAUNDERING	5
CONTINUOUS IMPROVEMENT	5
EMPLOYEE RESPONSIBILITIES OF ASSETS INTERESTS AND PROTECTION	5
PROTECTION AND PROPER USE OF ATARJAMAT ASSETS	5
CONFLICTS OF INTEREST	5
CONFIDENTIALITY	6
ANTI-CORRUPTION	6
DIRECTOR, OFFICER & EMPLOYEE RESPONSIBILITIES	6
COMPETITIVE REWARD SYSTEM	6
VIOLATIONS	6
OUTSIDE EMPLOYMENT	7
COMPLIANCE	7
CUSTOMER FOCUS	7
TEAMWORK	7
Data Privacy	7
RESPECTING PEOPLE AND COMMUNITIES	7
FAIR EMPLOYMENT POLICY	7
Recruitment opportunities in Atariamat	

General policy for recruitment	.7
THE WORK PLACE	8
THE ENVIRONMENT	.8
Reporting And Investigations Obligation to Report	.8
Filling a complain:	8

#### Code of Conduct

#### INTRODUCTION

Through the past decade, Atarjamat Company is committed to maintaining the highest level of trust and confidence. We could maintain our good reputation because of the adherence of our employees to the highest standards of Ethical behavior and professionalism while performing their tasks.

This Code of conduct sets forth a summary of the common standards we have established for the Company which prevents committing any irregularities. The Code is crucial in ensuring that all our employees are aware of the standards we have set for ourselves. All employees are responsible for compliance with the Code, and failure to comply with its provisions is grounds for disciplinary action, which may include dismissal, and referral to the relevant governmental authorities. Ultimately, all the employees are responsible for using good judgment and acting in a manner consistent with the values embodied in the Code.

Inserted here below definitions of some terms used in the code;

Employees: All the employees working in the company whether they are directors, senior employees or employees

Service providers: All the freelancers working with us through the internet accomplishing several tasks and they are not considered a part of the employees registered in the company.

Trust and confidence: We could maintain our good reputation because of the adherence of our employees to the highest standards of

#### LAWS & RECHLATIONS

Atarjamat's objective is to provide perfect services in competitive prices. In order to reach our objectives we have set this code that we must comply with.

#### CORF FTHICAL VALUES

#### **INTEGRITY**

Atarjamat realizes that our success is based on the Company's good reputation along with the clients trust and confidence this reputation has garnered. We respect the interests of our clients, and we do not accept any task unless we are sure we can accomplish it in a perfect performance and in a timely manner. We honor all our commitments with our employees and our service providers.

#### HONESTY

Atarjamat is founded on variety of notions and honesty is considered one of its main ethics. We believe that not only the stricture of regulatory compliance is what affects our decisions and approach; rather, honesty and truthfulness is considered the base of strong and ongoing relationship either with the customers, the employees or the service providers.

#### **FAIRNESS**

Atarjamat is committed to treating those with whom we deal in the same manner that we expect to be treated by others.

We compete in furtherance of our overall interests, yet we do so fairly, ethically, and in a manner that fully complies with all applicable laws and regulations, as well as the values and principles embodied in the Code.

Our history of success has been achieved through honest business competition. We do not seek competitive advantages through unethical business practices. We endeavor to deal fairly with our clients and the employees in the company. We oppose taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

#### RESPONSIBILITY

Atarjamat has a history of living up to the commitments and responsibilities we have towards our clients, employees and service providers. To our clients, we are committed to providing our services in an efficient and professional manner consistent with their needs and valuable in terms of price and quality. To our employees, we offer challenging positions in a professional and collegial environment and equal opportunities for performance-based professional development. To our service providers, we seek to build mutually beneficial relationships. We do not sacrifice legal compliance for the sake of profits; rather, we are committed to respectable business practices and to compete by providing superior services.

#### **COMPETENCE**

Atarjamat invests tremendous resources of time, energy, and expense into developing our services, choosing and training the employees. In addition, Atarjamat has built a strong network of our customers, employees and service providers due to our honest services and dealings. We value both innovation and experience in our personnel. All employees possess a wealth of experience in the virtual assistance field.

#### **TRUST**

Trust is the hallmark of Atarjamats' relationships with the clients, the employees and the service providers. As for the clients the Company provides special services that give them peace of mind in the knowledge that they can depend on us, thereby freeing them to dedicate more attention to their investment strategies. As for our employees and service providers, they trust us to value and respect them.

#### CORE PROFESSIONAL VALUES: BUSINESS PRACTICES

#### **REGULATORY COMPLIANCE**

As a regulated entity, Atarjamat is required to meet strict standards. We comply with all applicable Egyptian labor laws and regulations. We respect all regulations affecting the security of the data. Ultimately we take conscientious provisions to protect the clients' interests against manipulation and unauthorized use.

#### CONFIDENTIALITY

Atarjamat maintains appropriate and strict ways to control and monitor the transfer of information concerning our business, our clients or our employees. We do not deliberately disclose non-public information, unless in connection with the delivery of services to our clients, upon request of our clients, or as required to do so by law.

#### TRANSPARENCY

Atarjamat strives to maintain an open and transparent dialogue with our clients and others, based on fairness, mutual respect, and professionalism.

#### **RISK MANAGEMENT**

Atarjamat always takes the initiative to engage in conscious, disciplined and intelligent risk taking. We are guided by the instruments, procedures and managerial approval processes to monitor, control, and manage the risks to which we are exposed.

#### ANTI-MONEY LAUNDERING

Atarjamat is aggressively not allowing to be used as a vehicle for such any money laundry activity. It is a criminal offense and can subject its perpetrators and/or facilitators to substantial criminal and civil sanctions, including imprisonment and fines.

To ensure compliance with anti-money laundering laws and regulations, Atarjamat and all its employees will report immediately any money laundering or other suspicious activity.

#### **CONTINUOUS IMPROVEMENT**

We actively review our past performance and strive to adhere to the principles and values included herein.

# EMPLOYEE RESPONSIBILITIES OF ASSETS INTERESTS AND PROTECTION

#### PROTECTION AND PROPER USE OF ATARJAMAT ASSETS

Theft, carelessness and waste have a direct impact on the Company's profitability. Employees have a duty to safeguard Company assets and ensure their efficient use. Company assets should be used only for legitimate business purposes, and employees should take measures to ensure against their theft, damage or misuse.

Company assets include intellectual property such as copyrights, trademarks, business and marketing plans, salary information and any unpublished financial data and reports.

Unauthorized use or distribution of this information is a violation of Company policy.

#### **CONFLICTS OF INTEREST**

Personal conflicts of interest arise when directors, officers or employees face a choice between their personal interests (financial or otherwise) and those of the Company. Conflicts of interest may call into question the Company's integrity as a whole. Accordingly, a director, officer or employee's service to the Company may not be subordinated to personal gain an advantage. All directors, officers and employees are expected to act in the Company's best interest. Similarly, any director, officer or employee aware of a transaction or relationship that could reasonably be expected to give rise to a personal conflict of interest should promptly discuss the matter with the management.

#### CONFIDENTIALITY

During the course of their service the employees may be provided access to confidential information regarding our company or our clients. Our employees are not permitted to disclose or use, either during or subsequent to their employment with Atarjamat, any such information they receive or develop, except for authorized business purposes or where legally mandated. This includes, but is not limited to, information stored on any computer system as well as proprietary software owned by Atarjamat.

Any director, officer or employee who possesses confidential information has an important responsibility to keep that information confidential, and to disclose such information internally only on a need-to-know basis. Directors, officers and employees must be discreet with confidential information and avoid communicating confidential matters in ways that are susceptible to interpretation or use by third parties.

#### ANTI-CORRUPTION

We expect our directors, officers and employees to act at all times in good faith, with due care, competence, credibility and diligence, and without any misrepresentation of material facts.

Each director, officer and employee shall endeavor to deal fairly with the Company's customers, competitors, suppliers and employees. No director, officer or employee shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.

No bribes, kickbacks or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other action. The Company and the director, officer or employee involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of the Code.

If anyone received a personal benefit as a result of his/her position, the manager and the company lawyer will start the suitable procedure.

#### DIRECTOR OFFICER & FMPLOVFF RESPONSIBILITIES

CORE PROFESSIONAL VALUES: EMPLOYMENT

ATARJAMAT'S COMMITMENTS TO EMPLOYEE EXCELLENCE & EQUAL OPPORTUNITY

Atarjamat seeks to create and maintain a professional environment designed to attract, develop, and retain outstanding people. We offer equal opportunities, irrespective of race, national origin, ancestry, physical disability, medical condition, or pregnancy ... We will not tolerate any form of unlawful discrimination, harassment, retaliation, or retribution. Employees are instructed to consult the policy document for our complete harassment policies and reporting procedures.

#### **COMPETITIVE REWARD SYSTEM**

Atarjamat offers a performance-based culture, with a corresponding competitive reward system and periodic fair and objective evaluations which take into account personal contribution to our overall efforts, as well as adherence to the values and principles set forth in the Code. Our officers and managers maintain an open-door policy designed to give each and every employee easy access to management.

#### **VIOLATIONS**

We assess whether violations of the Code have occurred and, if so, determine whether or not disciplinary measures should be taken against the violator and others involved in the wrongdoing. Disciplinary measures may include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension without pay, demotions, reductions in compensation, termination of employment, restitution, and legal action.

#### **OUTSIDE EMPLOYMENT**

Employment and participation in other activities outside the Company could interfere with an individual's duties as an Atarjamat employee. Service by any employee as a director and employee of any business other than Atarjamat requires written approval from the management. Unless given specific permission, service by any employee on a board or in an advisory position with other firms is not allowed.

#### **COMPLIANCE**

Each Atarjamat employee is personally responsible to abide by all applicable laws, rules, and regulations, as well as the internal policies of the company, including the principles and values embodied in the Code. These responsibilities include being familiar with the laws, rules, regulations, guidelines, and emerging best business practices relevant to their duties, and implementing them to the best of their abilities.

#### **CUSTOMER FOCUS**

We actively seek to distinguish ourselves from competitors in the area of customer service. We expect and encourage our employees to foster a customer-focused approach, and to treat our clients with utmost courtesy, professionalism and respect.

#### **TEAMWORK**

Our employees collaborate to embrace teamwork and to contribute their best efforts toward reaching common goals.

#### Data Privacy

Atarjamat respects your privacy and take the protection of Personal Information very seriously. The purpose of this policy is to describe the way we collect, store, use and protect information.

-You Can Find The Complete Data Privacy Document On Our Website -

#### RESPECTING PEOPLE AND COMMUNITIES

#### FAIR EMPLOYMENT POLICY & PROCEDURES

Atarjamat offers employment renewable contracts for the initial period of 1 year.

#### Recruitment Procedures in Atarjamat

Vacancies are always advertised on the company website, the company Facebook page, Linkedin or Google +. However, candidates who believe their qualifications and experience could be of interest to us, and willing to join Atarjamat, they can apply their CVs by accessing http://www.atarjamat.com/contact-us/join-us/ and submitting a message.

An excellent command in English language and excellent computer skills are prerequisite to qualify to the job vacancy.

#### General policy for recruitment

Atarjamat seeks to attract motivated professionals & experts aiming to develop their career in the company. We recruit qualified candidates with a minimum bachelor degree.

Career development depends on candidate's performance.

Accepting candidates is determined based on tests results and an interview.

Atarjamat conduct background investigations prior hiring through the following ways:

- 1- Consulting the social insurance body.
- 2- Contacting the persons mentioned as reference in the candidate's CV.

#### THE WORK PLACE

We manage our facilities in compliance with all applicable health and safety regulations. To do so, everyone at our facilities must follow all of our safety instructions and procedures. We give breaking time where the employees can have a walk out of the facility at the sunlight.

We are also following the safety regulations (such as providing fire extinguishers... etc).

#### THE ENVIRONMENT

- The company is committed to the protection of the environment, through the:
- Prevention of pollution.
- Responsible, efficient and sustainable use of natural resources such as paper, water... etc.
- Adjusting the air condition on 23 degree to protect the environment, and to provide suitable conditions for our employees
- Using the wasted water of the air condition in watering plants
- Minimizing our use of electricity by assuring shutting down all devices before leaving.

### Reporting And Investigations Obligation to Report

In order to protect all work partners and avoid legal exposure, employees should report any concerns about violations of the Code or any policy of the company. The Integrity Committee can then take appropriate remedial actions when violations are discovered.

#### Filling a complain and reporting violation:

If the employee notices any violation of this Code, of any regulations and the policies or was subject to any harassment, he/she should start reporting the complain in a written form (using the form uploaded on the company website) to be delivered directly to the integrity committee.

-You Can Find The Integrity Committee Form On Our Website -

Complaints by employees may be made on a confidential, anonymous basis. In case of violations by directors, senior employees.

Non Retaliation Policy: Atarjamat undertakes to protect the employee who is filling a complaint against any revenge act. Any person, regardless of position, who engages in retaliatory behavior, will be subject to disciplinary action.