



Supplier Code of Conduct

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POLICY STATEMENT

In Atarjamat, we believe that our success is built on a foundation of personal and professional integrity. We understand the challenge of ensuring high social, ethical and environmental standards within our business and throughout our supply chain, and we are committed to working collaboratively with our service providers and suppliers to ensure that these standards are continually improving. In order to achieve this, Atarjamat has developed this Social Compliance policy based on the internationally acknowledged ETI base code.

This Policy defines Atarjamat's minimum standards, along with the basic principles we expect from all our service providers and Suppliers. We are committed to ensuring that the standards outlined in the policy are effectively implemented, measured and monitored throughout our global supply chain and we require the support of our service providers and suppliers to achieve this goal.

To achieve these goals we are committed towards

- Integrity, honesty and sincerity by following ethical and moral standards.
- Achieving growth along with our customers, service providers and suppliers.

1. SCOPE

Atarjamat's management defines this policy as relevant to its partners.



2.1 Employment is freely chosen

- The suppliers shouldn't hire any forced, bonded, indentured or involuntary prison labour.
- Suppliers employees shouldn't pay fees or lodge "deposits" or original identity papers with their employer, and are free to leave their employer, on condition one month notice.

2. GENERAL PROVISIONS

Business Partners (including but not limited to service providers and suppliers) must comply fully with all legal requirements relevant, to the conduct of their businesses.

This policy communicates our values and expectations and emphasises the importance of responsible workplace policies and practices, which generally comply, at a minimum, with applicable occupational H&S, environmental and labour laws and regulations. The standards outlined below reflect the values we uphold in our own policies, and we expect our service providers and suppliers to follow these following standards and requirements.



Freedom of Association

- Suppliers' employees should have freedom of association and the right to collective bargaining is respected. The suppliers should adopt an open attitude towards the activities of both trade unions and worker organisations.
- Suppliers' representatives should not be discriminated and should have access to carry out their representative functions in the workplace.



Working Hours

- The suppliers working hours comply with national legislation and benchmark industry standards, whichever affords greater protection.
- The supplier should comply with applicable hour and benefits laws relative to the industry and/or local labour market.

Working Conditions

- A safe and hygienic working environment shall be provided by the provider, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Applicable occupational Health and Safety regulations will be adhered to, and a working environment which is safe and conducive to good health shall be provided. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers
- Access to clean toilet facilities and to potable water, and if appropriate, sanitary facilities for food storage shall be provided.



Fair wages are paid

- The suppliers must pay wages and benefits for a standard working week meet, at a minimum, national legal standards or industry benchmark standards.
- The supplier should provide all workers with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Wages shall be paid directly to the workers, at the agreed intervals and in full.
- Overtime must be paid at an enhanced rate, at a minimum compliant with national legislation.
- Deductions from bonuses as a disciplinary measure are permitted. All disciplinary measures should be recorded.



No Discrimination is Practiced

- Suppliers and service providers must comply fully with local laws regarding equality of employment opportunities.
- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, nationality, origin, age, disability, gender, marital status, union membership or political affiliation ...etc

Regular Employment is Provided

- To every extent possible work performed must be on the basis of recognised employment relationship established between the suppliers and his employees through national legislation and practice.
- Obligations to suppliers and service providers under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

No Harsh or Inhumane Treatment is Allowed, forced or child labor

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- All disciplinary actions must be recorded and be fair, proportionate and fully compliant with local laws.
- Suppliers and service providers will ensure access to confidential means of reporting inhumane treatment and workplace grievances.
- The supplier shall not use any indentured or **forced labor** in the manufacturing process. All applicants for employment voluntarily seek employment not under any forced condition.
- Suppliers do not use **child labour**. If children are found to be working indirectly for a supplier, the latter shall seek a sensitive and satisfiable solution that puts the best interests of the child first.

Business Integrity

- The supplier should strive to provide a workplace free of bribery and corruption by complying with all applicable laws relating to bribery, money laundering and/or corruption as well as prohibiting the exchange of money or anything else of value to or from anyone, including government officials, to influence actions or obtain an improper advantage.
- The supplier should protect its employees who report any violation of the codes or of any regulation.



Protect the Environment

- The supplier should conduct business in compliance with all applicable environmental laws, rules and regulations.
- The supplier's waste should be minimised and items recycled wherever this is practicable. Effective controls of waste in respect of ground, air and water pollution are adopted.
- In respect of energy use, all supplier's production and delivery processes, including the use of heating, ventilation, lighting and IT systems, are based on the need to maximise efficient energy use, and to minimise harmful emissions.

IMPLEMENTATION OF THE SOCIAL COMPLIANCE POLICY

Atarjamat is committed not only to comply with this Policy within its own business, but to work collaboratively with its Suppliers and service providers to drive compliance throughout the supply chain. We will support our Suppliers and service providers in achieving this objective and will abide by the following principles in order to drive this improvement in ethical performance.



Atarjamat Commits To:-

- Allocate the required resources in order to fully implement the Policy, including an internal system to record and monitor compliance throughout the supply base to this Policy.
- Assign responsibility for the implementation of this Policy to an appropriately trained management representative who will provide the suppliers and service providers with compliance updates and implementation performance as required.
- Work collaboratively with our suppliers, supporting them in the improvement of social, ethical and environmental standards where required and appropriate.
- Full compliance with this Policy within our own business and to ensuring that all relevant suppliers and service providers are aware of the Social compliance Policy.
- Acknowledge specific national, regional and cultural challenges that may affect compliance. Recognise service providers and suppliers' own standards where they are comparable to our own. Communicate this Policy to all suppliers and service providers and seek formal acceptance and commitment to its implementation.
- Report level of compliance to each supplier and request a comprehensive corrective action plan be developed, complete with relevant targets and timescales. Atarjamat will support suppliers and service providers through any remediation process and will monitor progress.
- Communicate periodically to Atarjamat management, suppliers and service providers the progress towards compliance with this Policy.
- Periodically review the suppliers performance and commitment towards Atarjamat policies in order to continually ensure the adequacy, suitability and continuing effectiveness of the supplier and/or policy .
- Cease trading with suppliers and service providers demonstrating a persistent disregard for this Policy, while giving appropriate consideration to the impact this may have on the supplier and community in which they operate.

Atarjamat requires its Suppliers and service providers to:-

- Comply with this Policy and all applicable laws in the countries in which they operate. Where standards differ, the standard which offers the greater degree of protection to workers shall apply.
- Allocate the relevant resource for full implementation of the Social compliance Policy.
- Communicate the Policy to all suppliers, service providers engaged in their supply chain. (Atarjamat will recognise suppliers' own Policy and standards where they are comparable with our own).
- Communicate openly and honestly with Atarjamat and allow access to documentation and sites as required to determine performance against this Policy.
- The conduct of our suppliers and service providers should not violate the basic rights of Atarjamat.



CONTINUOUS IMPROVEMENT

The Company commits to periodically review this policy in order to continually improve, taking into consideration changes in legislation, and any other requirements to which the Company subscribes, and in order to ensure the adequacy, suitability and continuing effectiveness of the policy.

Specifically, the policy will be routinely reviewed at the Company's Management Review Meetings and will be integrated into our website.



FILLING A COMPLAIN AND REPORTING VIOLATION

If the supplier or service provider 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 – www.atarjamat.com

Complaints by employees may be made on a confidential, anonymous basis. In case of violations by directors, senior employees, such reports should be delivered to the Labor Bureau.

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 a disciplinary action.

QUERIES ON SOCIAL COMPLIANCE

If you have any questions or would like to discuss our supplier social responsibility requirements in more details, please email us at <http://www.atarjamat.com/contact-us/contact/> or please visit our website at www.atarjamat.com

