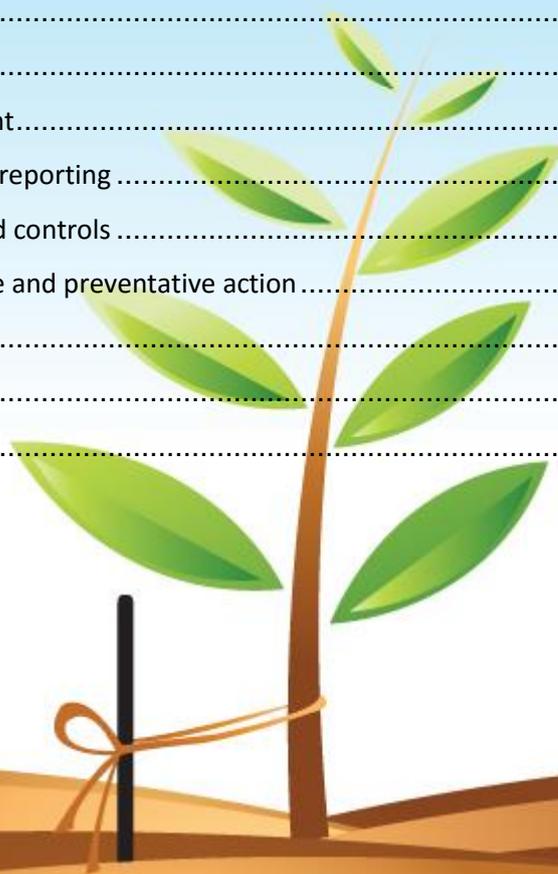


# ENVIRONMENTAL MANAGEMENT SYSTEM



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## 1. Introduction

### 1.1 The need for environmental management

ATARJAMAT Company was founded in 2005 as Research and Translation Company. We have expanded our services to include e-marketing and virtual assistance. Our customer base has been growing due to our professional performance, affordable prices and timely turnaround.

Some of the most highly regarded environmental services are part of our portfolio, and as a result, we have a responsibility to be as environmentally conscious as possible. Caring for the environment is therefore a fundamental objective of the organization.

Environmental management is important to ATARJAMAT Company for several reasons including:

- Managing environmental risks to the business
- Identifying opportunities for our business
- Ensuring we are compliant with environmental legislation
- Supporting the requirements of our clients and employees to minimize our environmental impact where possible
- Measuring our efforts to continually improve against environmental targets
- Enabling us to publicly demonstrate that we are managing our environmental impact
- Realizing cost savings and therefore supporting improved profitability

### 1.2 Scope

ATARJAMAT Company uses an operational control approach to include all environmental impacts from our office. Also included in the Scope of the EMS are supply chain impacts such as the sustainability of production paper, commuting and environmental considerations in procurement and supplier evaluation.

### 1.3 ATARJAMAT Company's environmental impacts

Examples of environmental impacts resulting from ATARJAMAT company's activities include:

ATARJAMAT Company activity (environmental aspect)	Examples of environmental aspects
Property and facilities management	<ul style="list-style-type: none"><li>• Water use and waste water production</li><li>• Chemical use and disposal e.g. for cleaning and maintaining buildings and grounds</li><li>• Resource use and disposal impacts arising from the generation and disposal of waste from day to day, replacement and refurbishment activities</li></ul>
Use of paper	<ul style="list-style-type: none"><li>• Implications of forestry and deforestation, pulp and paper production (e.g. waste, energy, chemical use etc.), transportation and disposal</li></ul>
Other supply chain impacts	<ul style="list-style-type: none"><li>• Manufacture and transport of goods and services used by ATARJAMAT Company e.g. IT equipment, office</li></ul>

	furnishings and fixtures, and stationary
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## 1.4 The purpose of this document

This document draws together the key elements of an effective EMS:

• The policy	Setting out the overarching objectives of environmental management
• Planning	The process to establish programs that lead to environmental management and performance improvement
• Implementation and operation	The people, resources and systems required to reach the environmental objectives and be compliant with the environmental policy
• Checking and corrective actions	The process for monitoring and measuring environmental performance and ensuring that objectives are met
• Management review	The regular review of performance and program scope and direction by CEO

This document provides a common language and should be used as a reference and, where stated, a standard, by all those involved in the environmental management and reporting systems within ATARJAMAT company.

## 2. Environmental Policy Statement

### 2.1 The Company environmental policy

Atarjamat has adopted a formalised environmental policy, which is a documented and officially approved statement outlining the company's commitments, principles, and strategies for environmental management and sustainability.

Given Egypt's rich coastal resources, our policy also considers the potential impact of procurement and waste practices on seas and oceans, particularly in the Mediterranean region near our Alexandria location.

The policy includes clearly defined, timebound targets and objectives to minimise environmental impacts. These encompass key areas such as:

- Greenhouse Gas (GHG) emissions reduction
- Physical climate change-related impacts (e.g. extreme heat, flooding)
- Greenhouse Gas (GHG) emissions
- Raw material and energy consumption
- Water usage, scarcity, and pollution
- Soil and groundwater contamination (from cleaning or equipment)

- Air quality
- Noise (particularly in office zones or equipment-related)
- Waste management
- Chemical use and management (cleaning agents, toners, etc.)
- Biodiversity and ecosystems
- Deforestation and sustainable sourcing risks
- Protection and conservation of marine and coastal ecosystems, and minimisation of impact on seas and oceans
- Responsible, efficient and sustainable use of natural resources such as paper minimizing its contribution to climate change, in line with the scale of action deemed necessary by science
- Requiring suppliers to meet the same objectives
- Working toward circular economy principles where practicable

This policy acts as a framework to guide environmentally responsible decision-making and operations across the organization. It is communicated to all employees, stakeholders, and the public to demonstrate our commitment to environmental stewardship. Performance against this policy is reported publicly through corporate sustainability reports and voluntary frameworks such as the Task Force on Climate-related Financial Disclosures (TCFD).

The company assesses, prioritizes, and mitigates environmental risks and seeks to maximize environmental opportunities as part of its risk management process.

Environmental Committee has ultimate responsibility for this policy, while the Chief Executive Officer responsible for each business unit are accountable for ensuring compliance with the policy and with any specific environmental regulations applicable to their businesses. They are supported by an environmental committee with functional responsibility for environmental initiatives.

A report to the Board will be made each year on the company's environmental performance compared with targets and subject to external validation as appropriate.

This policy is reviewed annually.

### **Additional Environmental Commitments**

Our environmental policy is aligned with our biodiversity and ecosystem transition plan, which is designed to support nature-positive outcomes. The plan includes timebound actions to identify, monitor, and mitigate biodiversity impacts across our operations and supply chain.

Atarjamat's policies are aligned with international and Egyptian standards and guidelines on

sustainable forest management and deforestation-free sourcing. This includes adherence to principles from recognized frameworks such as FSC (Forest Stewardship Council) and PEFC, where applicable.

Atarjamat's environmental policy directly reflects the material impacts, risks, and opportunities identified through our annual environmental risk assessment. The policy addresses key areas such as energy consumption, paper use, emissions, waste, and sustainable procurement, with commitments to minimize resource use, prevent pollution, and align with international sustainability standards.

Risks such as regulatory non-compliance, reputational harm, and supply chain vulnerabilities (e.g., deforestation risk in sourcing) are acknowledged and managed through procurement practices, data monitoring, and mitigation actions. Opportunities—such as reducing operational costs, increasing efficiency through digitization, and strengthening our ESG profile—are pursued through training, awareness, and supplier screening.

## **2.2 Availability of the policy**

The environmental policy statement is available for all employees on ATARJAMAT Company's website ([www.atarjamat.com](http://www.atarjamat.com)).

## **2.3 Coverage of the Policy**

The Company Environmental Policy statement is applicable to all business units within the ATARJAMAT Company.

# **3. Planning**

## **3.1 Risk Management**

The company assesses, prioritizes, and mitigates environmental risks and seeks to maximize environmental opportunities as part of its risk management process.

Risks given particular consideration are those that:

- Require legislative compliance
- Have significant cost implications for the business
- Have the potential to impact negatively on ATARJAMAT Company's reputation

### **Risk and Impact Assessment**

Atarjamat conducts a comprehensive annual assessment of environmental impacts, risks, and opportunities through a structured environmental risk identification process. While our operations are primarily virtual, we recognize our responsibility to assess and manage the environmental footprint of our physical office and digital service infrastructure.

The assessment includes:

- **Environmental Impact Assessment (EIA):** A systematic process used to evaluate the positive and negative environmental effects of our office operations, including energy consumption, waste, water use, and paper sourcing. This helps identify any direct or indirect impacts on air, water, land, biodiversity, and human health.
- **Environmental Risk Assessment:** We identify and analyse potential hazards that could result from our limited material use, emissions, or operational disruptions. While no environmental disruptions have occurred at our 350 m<sup>2</sup> office, this process ensures continued compliance with environmental laws, minimizes liabilities, and prepares us for unforeseen risks.
- **Opportunities Assessment:** As part of our sustainability strategy, we identify opportunities for environmental improvements, such as energy efficiency upgrades, waste reduction, increased digitization, and sustainable procurement. These opportunities align with both our internal performance goals and broader national/international environmental targets.

### 3.1.1 Scope of Environmental Risk and Opportunity Assessment

Atarjamat’s annual environmental assessment includes a wide range of categories to ensure thorough identification of risks, impacts, and improvement opportunities across our operations and supply chain. Even though our environmental footprint is limited due to our virtual nature and small office use, we apply best practices to maintain environmental responsibility.

**The following categories are considered in our assessment:**

- Physical climate change-related impacts (e.g. extreme heat, flooding)
- Greenhouse Gas (GHG) emissions
- Raw material and energy consumption
- Water usage, scarcity, and pollution
- Soil and groundwater contamination (from cleaning or equipment)
- Air quality
- Noise (particularly in office zones or equipment-related)
- Waste management
- Chemical use and management (cleaning agents, toners, etc.)
- Biodiversity and ecosystems
- Deforestation and sustainable sourcing risks

Each category is evaluated through a risk and opportunity lens:

- **Climate Change Risks:** We assess both physical risks (e.g., infrastructure disruptions due to climate events) and transition risks (e.g., changing regulatory requirements or client expectations). This includes scenario analysis and identifying mitigation or adaptation strategies.
- **Water Risk Assessment:** Although our water usage is minimal, we evaluate local water availability, consumption patterns, and pollution potential to ensure compliance and sustainability.

- **Chemical Risk Assessment:** We assess any substances used in cleaning or office maintenance for health, environmental, and exposure risks, following appropriate safety protocols.
- **Biodiversity Risk Assessment:** We examine our procurement and operational practices for any indirect impacts on ecosystems, and explore opportunities to support biodiversity, even through low-impact measures such as paper reduction and supplier screening.
- **Deforestation Risk Assessment:** We assess any risk of contributing to deforestation through our procurement, especially paper or wood-based products, and give preference to suppliers with FSC or equivalent certifications.

**Examples of opportunities identified through this process include:**

- **Resource efficiency:** Reducing energy, water, or material use leads to cost savings.
- **Reputational capital:** Demonstrating environmental responsibility improves stakeholder trust and enhances client relationships.
- **Products and services:** Strengthened supply chain sustainability contributes to service reliability and continuity, especially for international clients.

• **Resource Efficiency**

Reducing energy and paper use in the office through digitized workflows (e.g., using digital forms, shared drives, and online invoicing) minimizes utility bills and office supply costs: Switching from printed client reports to digital-only formats saved on printing materials and reduced electricity use from printers.

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• **Reputational Capital**

Demonstrating environmental commitment—such as paperless policies, ethical sourcing, and climate reporting—enhances Atarjamat’s credibility with clients (e.g., LexisNexis) who prioritize ESG-compliant vendors: Including sustainability practices in proposals or annual updates reassures international clients of Atarjamat’s alignment with their ESG policies.

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• **Products and Services**

Selecting environmentally responsible suppliers (e.g., FSC-certified paper vendors, eco-labeled digital tools) improves service reliability and ensures business continuity by reducing dependence on unsustainable or non-compliant supply sources: Choosing cloud-based tools with green data centers (like Google Workspace or Microsoft 365 with carbon-neutral claims) helps clients meet their sustainability targets while securing long-term service uptime.

### 3.1.2 Environmental Assessment Methods and Processes

Even though Atarjamat is a virtual services company with minimal material footprint, these categories were **systematically reviewed as part of our environmental risk and opportunity assessment process** for both direct (office-based) and indirect (procurement/supply chain) impacts.

Atarjamat applies a structured environmental assessment process annually to evaluate its environmental impacts, risks, and opportunities. This process is conducted by the Environmental Committee and involves collaboration between administration, facility management, and external sustainability reviewers when applicable.

The assessment process includes:

- **Checklists and screening tools** aligned with global ESG categories and Egyptian context.
- **Quantitative and qualitative analysis** of energy and resource consumption, waste generation, water use, emissions, and sourcing practices.
- **Scenario-based risk assessments** for climate-related disruptions and supply chain risks (including deforestation and biodiversity impacts).
- **Use of internal data systems** for monitoring paper use, water and energy bills, and employee commuting (to estimate GHG).
- **Supplier assessments** based on environmental credentials and certifications (e.g., FSC paper, eco-friendly cleaning products).
- **Employee feedback and engagement** to identify opportunities for low-impact behavior, such as digital-first policies and energy-saving measures.

Outputs from this process feed into Atarjamat's objective-setting, legal compliance checks, and the annual review of the Environmental Management System.

### 3.1.3 Climate Transition Risk Assessment

Our climate transition risk assessment shows that Atarjamat has limited exposure. While our direct emissions are low—due to a mostly remote workforce and small office footprint—we monitor evolving Egyptian regulations (e.g., 42% renewable energy by 2030) and increasing ESG demands from international clients. Through our EMS and climate transition planning, we review these factors, ensuring continued compliance and alignment with stakeholder expectations.

## 3.2 Legal requirements

Maintain a process to ensure that relevant and up to date environmental legislation is identified and that actions are taken to ensure compliance.

Our environmental policies are aligned with applicable Egyptian laws and international frameworks, including guidelines on sustainable forest management and deforestation-free sourcing. Where relevant, we give preference to certified products (e.g., FSC or PEFC paper) and environmentally responsible suppliers.

### 3.3 Objectives, targets and standards

Atarjamat is aligning its environmental objectives with a transition plan for biodiversity and ecosystem preservation. This includes actions to identify and mitigate biodiversity risks in our operations and procurement, and support national and global biodiversity goals. To augment the risk based approach objectives, targets and standards will be set at the Company and local or personal level where appropriate. These will be based on:

- Legal requirements
- Risk assessments and audit findings
- Environmental performance and good practice
- Dialogue with Clients
- Company objectives set as part of Environmental Committee

The objectives and targets will be agreed with those that have local responsibility for achieving them. Objectives and targets will be SMART – specific, measurable, agreed, realistic and time-based. Targets can be found in the Corporate Responsibility report, which is updated annually.

Details of our environmental targets, including baseline data, timelines, and alignment with strategy, are summarized below:"

Category	Target Description	Baseline (Year/Value)	Target Year	Rationale & Alignment
Air emissions	Reduce Scope 1 & 2 GHGs by 30 %	2023: 20 tCO <sub>2</sub> e	2028	Paris goals; national energy strategies
Water	Reduce office water use by 20 %	2023: 100 m <sup>3</sup> /year	2026	Egypt Vision 2030; resource stewardship
Energy	Reduce electricity use by 25 %	2023: 50,000 kWh	2027	Supports ISO-style green objectives
Waste	Achieve 50 % recycling rate	2023: 10 %	2025	Aligns with circular economy commitments
Biodiversity	Participate in 1 local restoration project/year	N/A	Ongoing	Supports SDG15 & ecosystem initiatives
Deforestation	Source 100 % FSC-certified paper	2023: 0 %	2024	Reflects deforestation-free sourcing

Atarjamat’s environmental policies are aligned with international standards and guidelines promoting sustainable forest management and deforestation-free sourcing, such as those set by the **Forest Stewardship Council (FSC)** and **Programme for the Endorsement of Forest Certification (PEFC)**.

While Atarjamat operates primarily as a virtual services company with a small physical office space (350 m<sup>2</sup>) and most of our 49 employees working remotely, we recognize our responsibility to manage environmental impacts across our supply chain, including paper and material sourcing.

Our relevant practices include:

- **Sustainable paper sourcing:** We prioritize the purchase of FSC-certified or recycled-content paper and office supplies, reducing reliance on products linked to deforestation.
- **Minimization of material use:** Given our digital service model (research, data entry, translation), our paper consumption is minimal. However, we monitor usage and encourage paperless workflows wherever feasible.
- **Supplier engagement:** For any office materials or equipment procured, we give preference to suppliers who demonstrate environmental responsibility and comply with recognized sustainable sourcing standards.

The company conducts extensive stakeholder consultations, the company voluntarily engages with clients, suppliers, and local communities to align with environmental expectations. This includes sharing sustainability practices with clients, selecting environmentally responsible suppliers, and participating in local initiatives like Nile cleanup events. Atarjamat also discloses environmental performance through voluntary frameworks such as CDP and TCFD.

Although our direct environmental footprint is small, we believe aligning with international forest stewardship principles reinforces our commitment to sustainability and supports global and local (Egyptian) environmental goals.

Atarjamat has established the following targets to manage climate-related risks and opportunities:

- **Reduce Scope 1 GHG emissions** by encouraging remote work and promoting carpooling for employees who come to the office, ensuring those commuting use a single shared vehicle—thus minimizing emissions from site-level transport.
- **Reduce Scope 2 GHG emissions** by optimizing office energy efficiency, transitioning to energy-saving equipment, and exploring procurement of green electricity in line with Egypt’s 42 % renewable energy goal by 2030.
- **Reduce Scope 3 GHG emissions** by minimizing employee commuting through a remote-first work model and utilizing sustainable procurement practices in the supply chain.
- **Increase low-carbon energy use** by evaluating green energy tariffs or small-scale solar installations to support national decarbonization efforts. Egypt is rapidly expanding its renewable energy sector—targeting 42 % renewables in its grid by 2030.

Target Area	Specific Target
Scope 1 GHG emissions	Promote carpooling for office attendees and maintain a remote-first work policy
Scope 2 GHG emissions	Improve office energy efficiency and transition to green electricity

Scope 3 GHG emissions	Minimize commuting and supplier-related emissions
Low-carbon energy use	Investigate renewable energy options (green tariffs or solar readiness)
Scope 3 reductions	Use SBTi-aligned guidance to set targets in the near future

In addition to climate-related goals, Atarjamat has set the following measurable targets:

- Reduce **water usage** in the office by 20% in the next three years by installing low-flow fixtures and raising employee awareness.
- **Minimize paper use** by 30% by end of next year through digital workflows and selective printing.
- Ensure **100% of office furniture and electronics** are reused, refurbished, or responsibly recycled by 2026.
- Increase **biodiversity awareness** by planting indoor greenery and supporting one local tree-planting event annually.

### 3.4 Water Management subsection

- **Absolute water reduction target:** Reduce office water use by **20% by 2026**, based on a **2023 baseline of 100 m<sup>3</sup>/year**.
- **Water intensity metric:** Track water usage per employee and per m<sup>2</sup> to monitor efficiency and set future improvements.
- **Water stress context:** While Alexandria isn't severely water-stressed, Atarjamat monitors consumption patterns and engages staff via awareness campaigns and signage.
- **Compliance & quality:** We ensure adherence to local water use regulations and monitor water quality parameters (for example, ensuring washroom discharge meets municipal standards).
- **Implementation actions:** Install low-flow taps/faucets, train staff on water-saving behaviors, repair leaks promptly, and track monthly utilities.
- **Reporting & review:** Water consumption is reported annually through **CDP Water module**, using recommended metrics like total withdrawals and intensity, and reviewed during the EMS cycle

This water stewardship approach aligns with CDP guidance and CEO Water Mandate disclosure frameworks, demonstrating transparency and operational efficiency.

### 3.5 Energy Targets

Atarjamat monitors and manages energy use through clear baseline data, absolute reduction targets, and intensity metrics across its operations:

- **Baseline & Target**

- *2023 baseline:* 50,000 kWh of electricity (~20 tCO<sub>2</sub>e Scope 2 emissions) and ~2,000 kWh of diesel-equivalent energy (Scope 1).
- *2025 baseline:* 24,000 kWh of electricity (~20 tCO<sub>2</sub>e Scope 2 emissions) and ~2,000 kWh of diesel-equivalent energy (Scope 1).
- *Targets:*
  - *Scope 2:* Reduce by 30% (to 35,000 kWh ≈14 tCO<sub>2</sub>e) by 2028 through LED lighting upgrades and energy-efficient office equipment.
  - *Scope 1:* Reduce on-site fuel energy by 25% through remote and carpooling policies.
- Both are supported by periodic technology audits.

- **Intensity Metrics:**

- Monitor kWh per employee and kWh per m<sup>2</sup> (targeting 20% improvement by 2025) to track efficiency regardless of team size.

- **Energy Sourcing:**

- Explore renewable electricity procurement and capacity for on-site solar to align with Egypt's 42% renewables energy mix target by 2030.
- Energy emissions calculated using **GHG Protocol scope 2 location- and market-based methods**

- **Targets & Alignment:**

- Absolute reductions are in accordance with **SBTi guidelines**, aiming to validate via SBTi SME pathway.
- Energy targets support Egypt's national energy strategy, improve resilience, lower operating costs, and contribute to our overall GHG reduction plan.

- **Review & Reporting:**

- Annual energy audits and consumption data are recorded, reviewed by the Environmental Committee, and reported in **CDP disclosures**.

**These targets are tracked as KPIs and reviewed annually by the Environmental Committee to drive continuous improvement.**

### **3.6 Waste Management & Emissions**

Atarjamat monitors waste in absolute and intensity terms and sets measurable targets:

- **Absolute target:** Reduce landfill-bound office waste by **40% by 2026**, referencing a **2023 baseline of 1 tonne** and **2024 baseline of 500 kilog**.

- **Intensity metric:** Track waste per employee and per m<sup>2</sup> annually to drive continuous improvement.
- **Scope 3 emissions (Category 5):** We calculate waste emissions—such as from third-party landfill, recycling, and mixed treatment—using **GHG Protocol Category 5 methods**, including average emission factors and supplier data.
- **Reduction measures:** Implement source segregation (paper, recyclables, e-waste), dedicated bins, staff training, and select recycling-focused haulers.
- **Circular economy approach:** Encourage reuse of office supplies and refurbishment of electronics to minimize resource use. Old devices such as computers, printers, and monitors are reused internally for spare parts or reassigned when possible, reducing the need for new equipment purchases and limiting e-waste generation.
- **Reporting & review:** Waste logs and hauler data are tracked monthly; reviewed annually by the Environmental Committee and disclosed in the **CDP report**. This informs EMS corrective actions when needed.

This approach ensures transparency, aligns with CDP and GHG Protocol standards, and is embedded in ongoing EMS performance monitoring.

### 3.7 Pollution Prevention

Atarjamat applies pollution prevention strategies to minimize negative impacts from its office and operations:

- **Source reduction:** Reduce emissions by turning off lights and equipment, using energy-efficient devices, and promoting remote work and carpooling—which lowers electricity and commuting-related air emissions.
- **Indoor air quality:** Maintain proper ventilation, use low-VOC cleaning supplies, and incorporate indoor plants to improve air freshness.
- **Chemical handling:** Store cleaning agents and toners securely, ensure spill trays, and use proper bins for disposal, reducing soil and water contamination risks.
- **Server/cloud use:** Opt for green-certified data centers to limit upstream pollution generation.
- **Pollution monitoring & training:** Staff receive guidance on switch-off habits, spill response, and pollution prevention. Incidents (e.g., toner spills) feed into corrective actions under Section 5.4.

#### Targets & Metrics:

- Decrease office pollutant-generating electricity and emissions by 30% by 2028.
- Achieve 100% compliance with spill control procedures by 2026.

#### Pollution Control Technologies or Measures Employed to Mitigate Air Pollutant Emissions:

Although Atarjamat does not operate in a high-emission industry such as manufacturing, energy production, or extractives, it falls under **administrative and support activities**, one of the categories where pollution control measures remain

relevant—particularly in managing emissions from electricity use, office operations, and commuting.

Atarjamat employs **pollution prevention measures appropriate to its scale and sector**, including:

- **Use of energy-efficient equipment** to reduce electricity-related indirect (Scope 2) emissions.
- **Remote work and carpooling policies** to reduce transport-related (Scope 3) air emissions.
- **Low-VOC cleaning products** to minimize indoor air pollutants such as volatile organic compounds.
- **Proper storage and disposal** of toners and cleaning agents to prevent potential release of hazardous substances.
- **Switch-off protocols and ventilation practices** to ensure reduced emissions and improved indoor air quality.

**Substances** that may be found in **cleaning liquids** used in office environments—even in **very small quantities**—that fall under the categories of **inorganic pollutants**, **Persistent Organic Pollutants (POPs)**, and **Substances of Concern (SOC)/Substances of Very High Concern (SVHC)**:

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### □ 1. Inorganic Pollutants

These are typically metal-based or non-carbon substances that can be harmful in high concentrations.

<b>Substance</b>	<b>Where It May Appear</b>
<b>Ammonia</b>	Glass/window cleaners, disinfectants
<b>Chlorine compounds</b>	Bleach-based cleaners, disinfectants
<b>Phosphates</b>	Degreasers, multi-purpose cleaners
<b>Sodium hydroxide</b>	Oven cleaners, heavy-duty degreasers
<b>Hydrogen peroxide</b>	Disinfectants, stain removers

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### □ 2. Persistent Organic Pollutants (POPs)

POPs are **unlikely** to be intentionally included in modern cleaning products, but may exist as **residuals or banned legacy substances** in older or low-quality products. POPs are listed in the **Stockholm Convention**.

Substance	Possible Source/Concern
<b>Polychlorinated biphenyls (PCBs)</b>	May contaminate older building materials or equipment lubricants
<b>Perfluorooctane sulfonate (PFOS)</b>	Sometimes used in stain-resistant or surface-protective sprays
<b>Dioxins and furans</b>	Not found in cleaners directly, but may be trace contaminants

### □ 3. Substances of Concern (SOC) / Substances of Very High Concern (SVHC)

These are defined under the **EU REACH Regulation** and include substances that are carcinogenic, mutagenic, toxic to reproduction (CMRs), or bioaccumulative.

Substance	Where It May Be Found
<b>Triclosan</b>	Antibacterial hand soaps, surface disinfectants (banned in many regions)
<b>Formaldehyde or formaldehyde releasers</b>	Preservatives in cleaning liquids, disinfectants
<b>Nonylphenol ethoxylates (NPEs)</b>	Detergents, surfactants (restricted in EU)
<b>Phthalates (e.g., DEHP)</b>	Fragranced cleaning sprays, air fresheners
<b>Benzene derivatives</b>	Certain degreasers or solvent-based cleaners

### □ Conclusion for Office Use:

Even in a low-risk, office-based setting, cleaning products **may contain trace amounts** of these substances unless:

- **Eco-labeled (e.g., Green Seal, EU Ecolabel)**
- **Certified low-VOC or non-toxic**
- **Specifically formulated without SVHCs**

While the company's emissions do not include significant NO<sub>x</sub>, SO<sub>x</sub>, PM, or HAPs, these measures reflect a proactive approach to managing potential air pollutants, in line with best practices for office-based service providers. These controls support Atarjamat's commitment to environmental responsibility within the administrative support sector.

These measures comply with EPA and CDP guidance and are tracked through KPIs, audited annually, and reviewed via CDP disclosure and EMS management review.

In line with our EMS framework, we also monitor air emissions sources annually and track overall air quality indicators, especially indoor air freshness, ventilation adequacy, and low-emission office equipment performance. These efforts support compliance with voluntary frameworks such as CDP and align with our broader commitment to reducing environmental impact.

### 3.8 Biodiversity Targets

Atarjamat assesses and manages biodiversity impacts and opportunities in alignment with global frameworks (e.g., Kunming-Montreal Global Biodiversity Framework & SBTN), and includes clear targets and monitoring:

- **Assessment & Baseline:** We evaluated potential impacts via procurement practices (e.g., FSC paper, eco-labeled digital tools) and community initiatives (e.g., restoration projects), identifying no direct habitat or species harm in Alexandria’s urban context.
- **Target:** Participate in at least **one local ecosystem restoration event annually**, such as coastal clean-ups or native tree planting, to support biodiversity preservation.
- **Intensity Indicator:** Track **restoration hours per employee** and **number of native plants introduced** each year.
- **Approach:** We follow biodiversity best practice guidance (e.g., ISO 14001 clause 4.3.3) to set transparent, meaningful objectives.
- **Review & Reporting:** Activities and indicators are included in CDP disclosures and reviewed annually to refine goals, identifying new biodiversity opportunities in line with “nature-positive” ambition.

### 3.9 Deforestation & Sourcing

Atarjamat applies strict sourcing policies to minimize deforestation-related risks and ensure compliance:

- **Policy & Baseline:**
  - 2023 baseline: 0% FSC-certified paper usage; no deforestation-free claim in place.
- **Target (2024 onward):**
  - Achieve **100% deforestation-free sourcing** for all paper and wood-based products by end-2024.
  - Use **FSC or PEFC certification** as verification for suppliers.
- **Scope & Measurement:**
  - Track total paper volume purchased annually and percentage certified.
  - Use CDP's forest-risk commodity indicators to report progress
- **Mitigation Actions:**
  - Update procurement policy to require certification.

- Audit suppliers for compliance.
- Conduct annual reviews to maintain traceability and supplier alignment.
- **Alignment & Reporting:**
  - This target aligns with the Accountability Framework Initiative and CDP's forests module.
  - Progress is reported annually via CDP and evaluated during EMS management reviews. Aims to fully eliminate commodity-driven deforestation from procurement by end-2024, demonstrating commitment to global deforestation reduction goals.

### 3.10 Chemical Use and Approval Procedure

To ensure the safe and environmentally responsible use of all chemical substances, Atarjamat has established a chemical procurement and approval process that is reviewed and authorised in accordance with applicable environmental and safety regulations.

This process applies to the purchase and introduction of any new cleaning, maintenance, or office-related chemical product used at the site, even in small quantities.

#### Key steps include:

1. **Initial Review:**  
Any request to purchase a new chemical must be submitted to the Environmental Committee or designated facility manager for review.
2. **Safety and Compliance Check:**
  - The product must be accompanied by a valid **Safety Data Sheet (SDS)**.
  - It must comply with applicable **local regulations and international standards** (e.g., REACH, GHS labelling).
  - Preference is given to **non-hazardous or low-VOC products** that align with Atarjamat's pollution prevention and health & safety objectives.
3. **Environmental Impact Screening:**  
The product is screened to evaluate its potential impacts on **indoor air quality, waste management**, and any emissions risk.
4. **Approval and Documentation:**  
Once verified, the product is added to the **Approved Chemical List**, and storage, handling, and disposal procedures are updated accordingly.
5. **Training and Communication:**  
Employees who will use the chemical receive relevant training on safe handling, spill response, and storage, based on the SDS and internal guidelines.
6. **Annual Review:**  
The list of approved chemicals and their compliance documentation is reviewed annually as part of the EMS performance review.

All chemicals are evaluated before approval using selection criteria that consider **toxicity, flammability, reactivity, and environmental impact**. Preference is given to products that are classified as non-hazardous, non-flammable, and biodegradable.

As part of our environmental commitment, Atarjamat maintains a programme to **identify and substitute hazardous substances** with safer, low-impact alternatives wherever feasible. This includes reviewing alternative products annually and selecting eco-labeled, low-VOC, or non-toxic formulations whenever available.

Employees handling cleaning products or toners are trained in safe handling procedures. PPE such as gloves is provided where appropriate. Cleaning agents are used only in **well-ventilated areas** to minimize VOC exposure.

All chemicals are stored in **labeled, sealed containers** in a designated storage area, away from heat and incompatible materials.

Chemicals are stored in appropriate containers that are intact, clearly labeled, and checked periodically. Incompatible substances are **segregated based on chemical class** (e.g., acids, bases, oxidizers) to prevent reactions. Spill trays and absorbent materials are kept nearby.

Atarjamat has a response plan in place for managing chemical spills or releases. This includes isolating the area, using absorbent materials to contain the spill, and safely disposing of contaminated materials. A designated responder is trained in small-scale spill containment, and incidents are documented and reviewed by the Environmental Committee.

## 4. Implementation and Operation

### 4.1 Structure and Responsibilities

Ultimate responsibility for the implementation of the environmental policy lies with the Chief Executive Officer, who shall ensure that the resources are available for the adequate achievement of the EMS as set out in this manual.

The following structure and responsibilities have been established to ensure the implementation of environmental management programs and to provide direction and support for the achievement of objectives and targets:

Organizational structure	Responsibilities
Environmental committee	Company Environmental Policy <ul style="list-style-type: none"> <li>• Review environmental risks and impacts</li> <li>• Regular review of Company environmental policy planning and implementation</li> <li>• To define and agree environmental objectives, targets and areas of focus</li> <li>• To establish and monitor initiatives to achieve environmental objectives and targets</li> <li>• Periodic review of the elements of the environmental management system</li> <li>• To provide advice to the working groups and business units</li> </ul>

	<p>as required</p> <p>Monitoring and reporting</p> <ul style="list-style-type: none"> <li>• Review compliance with the Company environmental policy</li> <li>• To initiate and drive data gathering in preparation for environmental disclosures including for the Annual Report and Accounts and website disclosure</li> <li>• To review environmental disclosures</li> <li>• To report to the ATARJAMAT Board as appropriate on environmental issues</li> </ul>
<p>Environmental committee Representatives including:</p> <ul style="list-style-type: none"> <li>– Facility management</li> <li>– Purchasing</li> <li>– IT</li> </ul>	<p>Planning and implementation</p> <ul style="list-style-type: none"> <li>• To develop action programs to achieve objectives and targets;</li> <li>• To implement action programs; monitoring and reporting</li> <li>• To facilitate data gathering and information to report on progress of the action programs</li> <li>• The Environmental Champions Network will include individuals responsible for year-end data gathering</li> </ul>

## 4.2 Awareness and communication

The objective of internal communication is to build awareness and commitment regarding environmental issues and environmental management, and to develop employee involvement in achieving Company environmental objectives.

All employees should be made aware of:

- ATARJAMAT environmental policy
- The impact or potential impact of their activities on the environment
- Specific actions and responsibilities that can reduce environmental impacts

Communication of performance and related issues shall be included in existing communication channels.

ATARJAMAT Company website ([www.atarjamat.com](http://www.atarjamat.com)) allows external access to environmental documents including this EMS.

We believe it is important to enter into two-way communication and dialogue with all of our clients and facilitate and attend various forums and meetings throughout the year.

Atarjamat provides structured environmental training and awareness initiatives to ensure all employees understand sustainability principles and contribute to our environmental objectives. Our program includes:

- **Onboarding sessions** for new hires, covering the EMS, policy highlights, GHG tracking, resource conservation, waste segregation, and spill-response protocols.
- **Quarterly webinars and workshops** focused on topics like energy efficiency, paperless workflows, pollution prevention, biodiversity, and sustainable sourcing—featuring internal experts and occasional external guests.

- **E-learning modules** introducing key concepts such as GHG protocols, low-carbon commuting, and circular economy practices.
- **Green Champions network**, with volunteer staff promoting eco-tips, coordinating community activities, and modeling best practices.
- **Performance reinforcement**, including monthly reminders, posters, and team meetings that highlight progress and reinforce accountability.

These activities boost operational efficiency, reduce environmental risk, support our EMS goals, improve staff engagement, and enhance Atarjamat's reputation among clients and investors.

### 4.3 Environmental Training & Awareness Programs

In certain cases, formal training may be required to manage specific issues for example legal compliance, internal auditing, evaluation, energy efficiency, waste minimization and recycling by our company ... etc

Training needs should be identified on an ongoing basis and appropriate training provided where gaps occur.

All relevant employees receive training on the hazards associated with cleaning products and office chemicals. Training includes:

- Reading Safety Data Sheets (SDS)
  - Using appropriate PPE
  - Safe handling and storage practices
  - Spill containment
  - Emergency evacuation and incident reporting procedures
- Refresher training is conducted annually or when new chemicals are introduced.

### 4.4 Other environmental management systems within the Company

The EMS set out in this document covers environmental management at Company level.

Some business units or sites may also have their own EMS as a complement to the Company EMS.

### 4.5 Documentation

This documentation includes Company level environmental:

- Policies
- Guidelines
- Standards
- Procedures

Documentation relating to locally managed issues not part of the Company environmental management program should be retained locally as appropriate.

Documentation should be legible, dated (including modification date where appropriate) signed by appropriate manager (where necessary) and readily identifiable.

## **4.6 Community Environmental Initiatives**

Atarjamat encourages and supports voluntary participation in targeted environmental activities, including:

- Desert soil restoration fieldwork in Sinai
- Nile River cleanup events
- Hazardous waste segregation workshops in partnership with local NGOs

## **5. Checking and Corrective Action**

### **5.1 Monitoring and measurement**

The performance outputs of the EMS will be regularly monitored and measured to ensure that the system is working effectively and is achieving its aims. Atarjamat has established systems to monitor air quality and emissions annually. This includes identifying the sources of emissions—primarily from electricity use, minimal fuel combustion, and employee commuting—and tracking general air quality within the office environment. While pollutant-specific data (e.g. NO<sub>x</sub>, SO<sub>x</sub>, VOCs) is not reported due to the low-emission nature of our operations, the Environmental Committee reviews emission sources annually to ensure consistency with our pollution prevention objectives.

In particular monitoring and measuring activities will include:

- Review of compliance with the Company environmental policy
- Review of progress against objectives and targets through agreed key performance indicators (KPIs)
- Ensuring that material environmental risks have been identified and are being appropriately managed
- Ensuring that there is a regular and periodic evaluation of legal compliance KPIs will be monitored, as a minimum, on an annual basis at Company level, but more frequently than this as required at the business unit level.

Monitoring and measuring will be undertaken as part of:

- The monitoring of objectives and targets
- Regulatory requirements
- Normal business monitoring processes
- The year-end disclosure process

- Environmental committee annual activities including environmental audits and the year-end disclosure audit

## 5.2 Year end data gathering and reporting

The scope of issues has been defined as a result of our knowledge and prioritization of the environmental impacts of the company’s core activities, and through comments received from clients and employees.

The data gathered forms the basis of performance measurement relevant to Company environmental objectives, targets and forecasting.

Environmental data is collected monthly (where possible) and consolidated annually, covering such areas as:

Activity	Data
Energy and climate change	City Heating
	Total energy consumption
	Refrigerant
	Cost of electricity, and other fuels used
Waste and recycling	Waste Disposed split into going to landfill, being incinerated, creating energy from waste or being recycled/donated
	Packaging waste obligations
Paper use	Office paper purchased Sustainability of paper
Water use	Mains and other water supplies
	Cost of water used
Transport	Emissions from commuting to and from work

## 5.3 Data gathering processes and controls

Environmental data is gathered by ATARJAMAT and managed by the Environmental committee. This is in conjunction with the Accounting Services Department, Internal Audit, and Environmental committee. It is then reviewed externally to gain assurance. Guidelines relating to data gathering are issued annually, and include:

- Schedule of data gathering
- Sources and details of data to be collected
- Methodologies for data collection
- Data quality and control issues
- Instructions for data sign off at the business unit level

## 5.4 Non-conformance, corrective and preventative action

Non-conformance with the company's environmental policy and EMS, Company standards or any non-compliance with legislation may occur for a number of reasons. The reasons for non-compliance should be identified and prompt corrective or preventive action taken.

**Incident and Near-Miss Learning:** Atarjamat maintains a procedure for reporting and investigating environmental incidents or near misses (e.g. energy/waste irregularities, cable hazards). We perform root cause analysis and implement corrective and preventive actions. Lessons learned are incorporated into staff training, office practices, and updated procedures to prevent recurrence and drive continuous improvement.

Atarjamat maintains an internal process for reporting and learning from environmental near-misses or incidents (e.g., minor chemical spills, printer toner leaks, waste-sorting errors). When an event occurs—such as a paper jam causing toner scatter or accidental cleaning solution spill—staff are trained to report it using a simple form or email. The Environmental Committee logs the event, investigates root causes (e.g., equipment maintenance, labeling errors), and implements corrective actions (e.g., improved spill trays, updated waste bin labels, staff reminders).

Lessons learned are shared in monthly team meetings and added to update training materials. This approach—aligned with best practices for near-miss investigation and continuous improvement—ensures that small issues are prevented from escalating and that the EMS evolves proactively.

## 5.5 Records

Records shall be kept of all elements of the EMS. This should include records relating to:

- Establishing and implementing objectives and targets
- Performance monitoring against objectives and targets
- Compliance reviews and monitoring

The retention times of documents should be established and recorded. Records should be stored and maintained in a way that is accessible and retrievable.

## 5.6 Audit of the system

This manual establishes the Company EMS. The Company EMS shall be audited regularly by Environmental committee and externally for certification.

## 6. Management review

The environmental management system will be overseen and managed on an ongoing basis through the structure described in section 4.1. This includes:

- Senior review of the Company environmental policy and EMS by Senior Company Management at regular intervals, with not more than 12 months elapsing between reviews.

- Annual Environmental Checkpoint Meetings chaired by the CFO and attended by the environmental committee.

## **7. Filing a complain and reporting violation**

If the employee notices any violation of this code or any regulations, he/she should start reporting the violation in a written form (using the form uploaded on the company website) and to deliver it directly to the integrity committee by hand or through the website.

-You Can Find the Integrity Form on our website – [www.atarjamat.com](http://www.atarjamat.com)

Complaints by employees may be made on a confidential, anonymous basis.

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.

## Appendix

### Climate Transition Plan

#### Climate Transition Plan – Atarjamat

**Scope:** Applies to all operations, including employees, office infrastructure, remote teams, and the upstream supply chain.

**Timeframe:** 2025–2030 (initial phase); Net-zero target by 2050.

#### 1. Accountability

- The ESG Committee oversees the transition plan, reporting quarterly to the CEO.
- A Climate Transition Subcommittee (including finance, operations, HR) tracks implementation.
- Results are reviewed annually and disclosed in sustainability reporting.

#### 2. Integration & Internal Coherence

- The plan is embedded into Atarjamat’s EMS, business strategy, and financial planning.
- All climate actions align with ESG goals and are included in internal KPIs and audit reviews.
- Training and internal communications ensure alignment across teams and leadership.

#### 3. Targets & KPIs

- **GHG Reduction Targets:**
  - 25% reduction in total emissions by 2029 (Scopes 1, 2, and relevant 3)
  - Net-zero emissions by 2050
- **Key KPIs:**
  - Energy use per full-time equivalent (kWh/FTE)
  - % of renewable energy used
  - % of low-impact/recycled procurement
  - % of employees trained on climate topics

#### 4. Mitigation Actions

- Reduce energy use through smart systems, A/C scheduling, remote work energy guidance
- Switch to 100% renewable electricity by 2028
- Offset residual emissions through certified tree planting and local energy projects
- Digitize operations to reduce paper and plastic use by 50% by 2027

#### 5. Adaptation Actions

- Upgrade infrastructure to withstand heat/cold extremes

- Engage suppliers in sustainability screening and land use impact monitoring
- Implement flexible work policies for climate-related disruptions

### ***6. Resourcing***

- Internally funded through energy cost savings and budget reallocation
- Evaluate external sustainability grants to support infrastructure upgrades
- Carbon credit revenue (from offsets) reinvested in employee training and outreach

### ***7. Feedback & Review***

- The ESG Committee conducts quarterly reviews with input from employees and key suppliers
- Annual feedback collected via internal survey and shared in CEO-level strategy meetings
- Transition plan updated annually based on audit results and stakeholder feedback

## Engagement with Clients, Suppliers, and Partners on Environmental Matters

This appendix outlines Atarjamat's engagement with its clients, suppliers, and stakeholders on environmental and climate-related issues, in alignment with our Environmental Management System (EMS) and voluntary sustainability commitments.

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### 1. Awareness of Client Environmental Requirements

Atarjamat is fully aware of the environmental requirements of all end clients. These include compliance with international sustainability frameworks (e.g., TCFD, CDP), reduction of greenhouse gas (GHG) emissions, deforestation-free sourcing, energy efficiency, and low-impact digital service delivery. We maintain open communication with clients (e.g., LexisNexis) to stay aligned with their evolving environmental standards.

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### 2. Measures in Place to Meet Client Requirements

- ✓ Internal review of our performance against client environmental expectations.
  - ✓ Third-party review and validation where applicable (e.g., voluntary reporting to CDP).
  - ✓ Structured EMS reporting and annual objective setting aligned with client ESG requirements.
  - ✓ Supplier and product screening based on environmental certifications and criteria.
  - ✓ Integration of sustainability practices into proposals and updates shared with clients.
- 

### 3. Climate-Related Collaboration with Clients, Suppliers, and Partners

Atarjamat collaborates with:

- ✓ **All clients**, sharing our environmental initiatives and aligning deliverables with their ESG goals.
- ✓ **Suppliers and business partners**, ensuring responsible sourcing and reduced emissions.
- ✓ **Suppliers**, who are required to meet specific climate-related conditions such as FSC certification, low-carbon operations, and ethical sourcing.

- ✓ Our own workforce, through assessments of how climate change (e.g., extreme heat, electricity stress) may impact working conditions.
  - ✓ Our supply chain, where climate risk assessments are conducted, including sustainability of digital tools and materials.
- 

#### 4. Environmental Topics Engaged On

Atarjamat engages its clients, suppliers, and partners on the following topics:

- ✓ Climate change and GHG emissions
  - ✓ Water consumption and conservation
  - ✓ Energy use and efficiency
  - ✓ Chemical handling and safe use
  - ✓ Deforestation and sustainable forestry
  - ✓ Material selection and procurement standards
  - ✓ Plastic minimization
  - ✓ Waste management and circular practices
  - ✓ Biodiversity and ecosystem protection
- 

#### 5. Regulatory or Operational Stakeholder Engagement

While not legally required due to Atarjamat's small size and virtual operations, **limited stakeholder engagement** is conducted voluntarily:

- ✓ We engage with clients, local partners, and NGOs through initiatives like cleanup events and sustainable procurement programs.
  - ✓ EMS data and performance are disclosed voluntarily via CDP and aligned with international frameworks.
  - ✓ No legal or formal consultation is mandated by regulators due to our sector and location.
- 

#### 6. Topics Discussed with Local Communities and Stakeholders

Atarjamat discusses relevant environmental topics with community stakeholders during voluntary engagement initiatives:

- ✓ Climate change
  - ✓ Air quality
  - ✓ Pollution prevention
  - ✓ Water use and discharge
  - ✓ Waste reduction and recycling
  - ✓ Biodiversity preservation (e.g., tree planting, eco-campaigns)
- 

## 7. Feedback and Collaboration Mechanisms

We have a formal and clearly communicated process for receiving feedback, addressing concerns, and collaborating with stakeholders:

- ✓ An online **Integrity Form** is available on our website for reporting any concerns, including environmental ones.
- ✓ Employees and partners can submit concerns anonymously without fear of retaliation.
- ✓ The Environmental Committee reviews stakeholder input and incorporates it into training, policy updates, and corrective actions.
- ✓ Regular team meetings, community participation, and supplier feedback loops are part of this system.

## Supplier & Stakeholder Engagement on Waste Management

Although Atarjamat does not operate in high-emission or resource-intensive industries (such as manufacturing, agriculture, or waste treatment), it adopts relevant environmental responsibility practices aligned with the principles typically required in those sectors. This includes expectations for supplier alignment, feedback systems, and due diligence around waste management.

### 1. Supplier and Contractor Expectations on Waste Management

Atarjamat sets clear environmental expectations for its suppliers and contractors, particularly regarding the handling, segregation, and disposal of office waste and electronic equipment. Priority is given to service providers (e.g., cleaning and waste contractors) who demonstrate a commitment to recycling, sustainable disposal, and reducing landfill contributions. This reflects Atarjamat's internal waste minimisation strategy and supports its goal of reducing landfill-bound waste by 40% by 2026.

## 2. Assessment of Supplier Waste Management Practices

While formal environmental audits are not currently conducted, suppliers are informally screened for alignment with Atarjamat's environmental values during selection. Recycling-focused haulers and service providers with responsible waste handling credentials are preferred. As part of future EMS improvement, Atarjamat may introduce periodic reviews or performance assessments of third-party waste contractors to strengthen this area.

## 3. Compliance History of Suppliers and Contractors

To date, no known violations or environmental compliance issues have been reported or identified among Atarjamat's active suppliers or contractors over the past three years. While not tracked through a formal registry, the Environmental Committee monitors supplier reliability and would take corrective action if any concerns arise.

## 4. Processes for Gathering Feedback to Improve Environmental Performance

Atarjamat has established systems for collecting feedback from employees, stakeholders, and clients to identify opportunities for environmental improvement. These include:

- Anonymous submission via the **Integrity Form** on the company's website
- Employee surveys and informal team feedback during regular environmental awareness sessions
- Client feedback channels that include ESG-related expectations
- Annual EMS review process by the Environmental Committee, which incorporates stakeholder insights into corrective actions and target setting

These engagement practices reflect Atarjamat's commitment to continuous improvement and environmental transparency, even as a low-impact office-based operation.