



SOCIAL COMPLIANCE POLICY and PROCEDURES

POLICY STATEMENT

Atarjamat 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.

At Atarjamat, our approach is to work closely with our customers following a detailed plan to each project in order to achieve the highest quality and satisfaction. We stand behind every commitment made to exceed customer expectations in providing the best services. We are committed towards

- Working with dedication and innovation, with total focus on our customer.
- Integrity, honesty and sincerity by following ethical and moral standards.
- Promoting a work culture that provides individual growth, team spirit and creativity to overcome challenges and attain goals.

• Achieving growth along with our customers, staff, service providers and suppliers

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 are committed to working collaboratively with our employees, 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.

Atarjamat formally commits to respecting and upholding the **Universal Declaration of Human Rights (UDHR)**, the **UN Guiding Principles on Business and Human Rights**, and the **Core Labor Standards of the ILO** throughout our internal operations and global supply chain. In doing so, we explicitly pledge to protect and advance the human rights of vulnerable groups, strictly adhering to the **Convention on the Elimination of Discrimination Against Women (CEDAW)**, the **Convention on the Rights of the Child**, and the legal rights of **persons belonging to national, ethnic, religious, and linguistic minorities**.

This Policy's Procedures defines Atarjamat's minimum standards application, along with the basic principles we expect from all our employees, 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.

0.0 SCOPE

Atarjamat's management defines these procedures as relevant to the organization itself.

1.0 LAW AND REGULATIONS

As our company is governed by the Egyptian Labor Laws, particularly we are Complying with its laws and regulations. The procedures outlined below reflect the values we uphold in our own policies.

Responsibility

Director General

HR & Compliance Manager

Procedures

- Orientation program is done for new employees and makes them aware of the Egyptian labor law rules and regulations regularly.
- Copy of the labor Laws (in Arabic) is sent to all employees.
- Copy of the contract (in Arabic) is kept with the employees.
- Internal public addressing media communicates special announcements such as new regulations and practices.
- A memo or the photo copy of the amended laws should be sent to the relevant managers of the company.
- A notice in local language is displayed on the notice boards and announcements are made through the public address system.
- Any update to the labor law and or general improvement shall be announced and added to the company documents.
- Internal training sessions is conducted for all the employees.
- Annual internal audit shall be conducted to make sure all the laws are correctly applied.

2.0 FAIR WAGES ARE PAID

- Wages and benefits are paid (last day of the month 30th or 31st) for a standard working week meet, at a minimum, Egyptian legal standards or industry benchmark standards.
- All employees shall be provided 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 to the employees, at the agreed intervals and in full.

Wages shall be paid directly. Overtime must be paid at an enhanced rate, at a minimum compliant with Egyptian legislation. (Overtime is %135 in case of after hours, %170 in case of weekends). Maximum working hours, including overtime, shall not exceed 8 hours per day.

- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages that are not provided by Egyptian law. All disciplinary measures should be recorded.
- Atarjamat provides medical insurance coverage for all employees.
- Exceptional expenses are offered for employees: giving birth, funeral in case of first degree relatives, marriage.

Responsibility

Director General

HR & Compliance Manager

Procedures

A pay sheet should be given to all employees in local language stating their basic salary OT payment other earning and deductions. Should utilize and maintain an organized system of record keeping. Should retain the pay roll records to support compensation including over time. Providing awareness through Orientation regarding Wage, OT Calculation ... etc

3.0 FREEDOM OF ASSOCIATION

- The freedom of association and the right to collective bargaining is respected. The employer adopts an open attitude towards the activities of both trade unions and worker organisations.
- Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- One employee was already elected to be representative of each department. Their meeting minutes are documented.

Responsibility

Director General

HR & Compliance Manager

Procedures

Respects employees' right to freely associate or form organizations in line with national law.

4.0 Health and Safety

Atarjamat is committed to do all that is reasonably practicable to minimize the risk of any foreseeable hazards which may result in personal injury, occupational health and industrial hygiene issues damage to property, fire and /or security loss. We will continuously improve our standards of safety so as to ensure the well being of those working on visiting in the vicinity of our premises.

Responsibility

Director General

HR & Compliance Manager

Procedures

- Comply with all relevant Egyptian legislations and standards of the health and safety regulations.
- Identify all hazards, which may cause injury, ill health or property damage and continuously improve the equipment and Procedures to eliminate or minimize the risk of exposure.
- Provide appropriate training and disseminate information on health & safety for all its employees.
- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards (ergonomic, electrical, fire, and fall 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. Employees shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned employees.

- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe and meet the basic needs of the employees.
- Responsibility for health and safety shall be assigned to a senior management representative.
- Several members of the staff shall get an annual first aid training to be able to help their colleagues in case of any injury happen and until an ambulance arrive.

5.0 Child Labour

- Atarjamat does not engage in or support the use of child labour.

Responsibility

Director General

HR & Compliance Manager

Procedures

- We verify the age on the production of the original Birth Certificate issued by the Registrar Births & Deaths, we only keep copies of the official documents.
- The identity of the applicants is crosschecked against the birth certificate by checking the Egyptian identity cards on which the date of birth and full name of the applicants are affixed.
- We do not recruit child labour. (“Child Labour” being defined under Egyptian law as employees under the age of 18 in certain developing countries).
- 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.
- Atarjamat will help the child to return to his or her educational path and to help him or her financially.

6.0 Working Hours

Working hours comply with Egyptian labor law and benchmark industry standards, whichever affords greater protection.

Responsibility

Director General

HR & Compliance Manager

Procedures

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- To every extent possible work performed must be on the basis of recognised employment relationship established through Egyptian law and practice.
- Overtime work should be voluntary. Overtime is voluntary and pre-approved by management. No employee will be forced to stay beyond regular working hours.
- It is company policy to adhere to the local laws pertaining to the hours of work, which is generally on 8 hours per day , 5 days per week. Total overtime hours for all employees should not exceed 2 hours during working day.
- At least 1 rest day per week is guaranteed in compliance with Egyptian law. The company provides 2 rest days per week whenever feasible.
- Rest time 45 minutes during the day.
- Paid leaves are as follow: sick leave, vacation leave, maternity leave, severance pay.

7.0 No Discrimination is Practised

- Atarjamat 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, religion, age, disability, gender, marital status, union membership or political affiliation ...etc.

Responsibility

Director General

HR & Compliance Manager

All Managers

Procedures

- Atarjamat will employ employees on the basis of individual performance and potential, not on the basis of their personal characteristics or belief. The fact of having a family relationship with another employee, no matter where in the hierarchy, does not justify advantage of any kind.
- Atarjamat will not subject any person to discrimination in employment, including hiring, salary, benefits, promotion, discipline, termination or retirement... on the basis of gender, race, religion, age, marital status, physical features, disability, pregnancy, Egyptianity, political opinion/ belief or social or ethnic origin.
- In case of foreign employees, we require a work permit.
- Atarjamat will recognize and respect the legal rights of employees to free association.
- If there is any contravention of the abuse policy at the company immediate notice of such contravention should be lodge to the Personnel Department verbally or in writing Suggestions / complain through the website.
- Disciplinary actions will be taken against those who violate the policy.

- Training programmed on the anti discrimination policy will be notified at the orientation programme.
- Atarjamat ensures equal opportunity in employment and does not discriminate based on physical or mental disability. Reasonable accommodations are provided where possible, and employees with disabilities are supported in ways that respect their dignity and personal needs. This includes the employment of individuals with mental disabilities who are not required to perform traditional work functions but are fully included in our wage and social responsibility systems.

8.0 FORCED LABOR

The company shall not use any indentured or forced labor in the manufacturing process. All applicants for employment in the company voluntarily seek employment not under any forced condition

Responsibility

Director General

HR & Compliance Manager

Procedures

- Our labor is employed on a contract of employment, and the terms and conditions of employment are mutually agreed.
- Every employee should submit an application for the post she applied for.
- The recruitment of labor is done on advertisement and walk – in interviews. On selection, a call of appointment is issued to the employees according to their posts.
- Awareness of policies will be given to all existing employees and new employees.
- The handbook containing policies is displayed to all employees on bulletin board.
- There is no forced, bonded, indentured or involuntary prison labour.
- Employees are not required to pay fees or lodge “deposits” or original identity papers with their employer and are free to leave their employer after one month notice.
- Employee is also free to resign at any time, for any or no reason, giving a prior notice of 2 weeks.

9.0 No Harsh or Inhumane Treatment is Allowed

- Employee / employees should not be subjected to any abuse and all types of harassment (Physical / verbal / sexual / psychological) by employee/ employer, or any other party of the company. There should not be any abuse between employee and employee, employees & employer or any other party of the company. All the employees are bound to follow the zero abuse policy at the facility and any type of harassment is not accepted at the company. If there is any such abuse at the company immediate notice of such complaint should be lodge to the Personnel Department verbally or in

writing “It is the policy of the Company to promote a productive work environment and not to tolerate verbal or physical conduct by any employee that harasses, disrupts, or interferes with other’s work performance or that creates an intimidating, offensive, or hostile environment.

Responsibility

Director General

HR & Compliance Manager

Procedures

1. PROHIBITION OF HARASMENT

No supervisor or manager is to threaten or insinuate, either explicitly or implicitly, that an employee’s refusal or willingness to submit to sexual advances will affect the employee’s terms or conditions of employment.

Other sexually harassing or offensive conduct in the workplace, whether committed by supervisors, managers, non-supervisory employees, or nonemployees, is also prohibited. Any of the above conduct, or other offensive conduct, directed at individuals because of their race, religion, disability, pregnancy, age, or military status is also prohibited.

2. WHAT TO DO WHEN THERE IS HARASSMENT:

Any employee who believes that a supervisor’s, manager’s, other employee’s, or non - employee’s actions or words constitute unwelcome harassment has a responsibility to report or complain about the situation as soon as possible. The report or complaint should be made to the employee’s supervisor; or to the HR Manager if the complaint involves the supervisor or manager. Complaints of harassment will be investigated promptly and in a confidential manner. Employees are required to cooperate in any investigation.

10.0 Protect the Environment

Responsibility

Director General

HR & Compliance Manager

Procedures

- Conduct business in compliance with all applicable environmental laws, rules and regulations.
- Waste is 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 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.

11.0 Business Integrity

Responsibility

Director General

HR & Compliance Manager

Procedures

- 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.
- Atarjamat conducts **annual internal audits** to assess compliance with its ethics, integrity, and anti-corruption policies. These audits review bribery reports, training attendance, gift declarations, and conflict of interest disclosures. Audit findings are presented to senior management and corrective actions are implemented and monitored. External auditors may be involved if required.
- Atarjamat conducts **annual internal reviews** of ethics, integrity, and anti-corruption compliance. These reviews include checks on adherence to this policy, training participation, and any reported incidents or violations. Results are reviewed by senior management, and corrective actions are documented and followed up.

12.0 IMPLEMENTATION OF THE SOCIAL COMPLIANCE POLICY

Responsibility

Director General

HR & Compliance Manager

Procedures

- Atarjamat is committed not only to comply with this Policy within its own business, but to working 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 employees are aware of the Social compliance Policy.
- Acknowledge specific Egyptian, 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 employees, management, suppliers and service providers the progress towards compliance with this Policy.
- 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.
- 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 employees shall apply.
- Allocate the relevant resource for full implementation of the Social compliance Policy.
- Communicate the Policy to all employees, 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.

- Suppliers must respect the labor, ethical, and environmental standards laid out in this policy. Violations will trigger corrective actions, and persistent disregard may result in termination of business. Our suppliers should not be engaged in:
- This policy is available in Arabic and English and is shared with all employees, suppliers, and stakeholders. It is also posted on the company intranet and website.

13.0 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.

14.0 FILLING A COMPLAIN AND REPORTING VIOLATION

Atarjamat encourages all employees to speak up if they experience or witness any violation of this policy, the company's internal regulations, or applicable laws. All complaints will be taken seriously, handled confidentially, and addressed promptly.

Internal Reporting Procedure:

- Employees should submit any complaint in writing using the official **Integrity Committee Complaint Form**, available on the company website: www.atarjamat.com
- The complaint form should be delivered **directly to the Integrity Committee**, which is responsible for handling grievances fairly, confidentially, and without retaliation.
- If the issue involves the employee's direct manager or department head, the employee may escalate the complaint **directly to the HR & Compliance Manager**.

Escalation Procedure (for serious or unresolved cases):

- If the complaint involves **a director, senior management member**, or if the employee believes that the issue has not been resolved adequately through internal channels, they may submit the complaint **to the competent authority**, such as the **Labor Bureau**, in accordance with Egyptian law.

Anonymous Complaints:

- Employees may choose to submit complaints **confidentially or anonymously**.
- Anonymous submissions will be reviewed with the same seriousness, provided sufficient detail is included to allow for an investigation.

Non-Retaliation Policy:

- Atarjamat strictly prohibits any form of retaliation against employees who submit a complaint in good faith.
- Any person, regardless of position, who engages in retaliatory behavior will be subject to disciplinary action.

15.0 QUERIES ON SOCIAL COMPLIANCE

If you have any questions or would like to discuss our 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

16.0 Fair Competition and Trade Compliance

Policy Statement

Atarjamat is committed to conducting its business in full compliance with all **applicable trade, competition, and anti-money laundering laws** in Egypt and internationally. We strive to maintain a marketplace that is fair, transparent, and based on merit—not manipulation or coercion.

We prohibit **unfair business practices**, including collusion, abuse of market power, misleading advertising, or the sharing of sensitive commercial information with competitors.

Scope of Application

This policy applies to:

- All Atarjamat employees and managers
 - Contractors, freelancers, and business partners
 - Any business activities that involve international clients, digital exports, or global collaboration
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Key Principles and Prohibitions

1. Prohibition of Anti-Competitive Practices

Atarjamat strictly prohibits:

- Agreements or informal arrangements with competitors to **fix prices, divide markets, or limit competition**
- Collusion in tendering or bidding
- Restricting other parties from entering or remaining in the market

- Sharing confidential business information with competitors

2. Prohibition of Unfair Trade Practices

Unfair competition is not tolerated, including:

- Misleading or deceptive information about services (price, origin, quality)
- Unauthorized use of competitor branding, service models, or confidential methods
- Attempting to damage a competitor's reputation through false or distorted statements
- Influencing customer decisions through misleading claims

3. Abuse of Market Power

The following behaviors are prohibited:

- Using influence to force a partner or client into unfair terms
- Selling services below cost with the intent to drive competitors out of the market
- Conditioning services in a way that prevents free market competition

4. Compliance with Trade Control Laws

Atarjamat complies with all international regulations related to:

- Trade embargoes and sanctions
- Export/import restrictions
- Anti-boycott regulations
- Prevention of money laundering and terrorist financing

Employees must consult the **legal or compliance team** before engaging in:

- Transactions involving restricted countries or flagged individuals/entities
- Cross-border service contracts where export laws may apply

Monitoring and Training

- Annual training on trade compliance and fair competition is mandatory for relevant staff.
- Compliance is reviewed as part of internal management audits.
- Any suspected violations must be reported via the Integrity Committee Form.

Consequences of Violation

Any employee or business partner found engaging in anti-competitive or unlawful trade behavior may face:

- Disciplinary measures (up to dismissal)
 - Contract termination
 - Reporting to relevant authorities
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Appendix

Freedom of Association

Policy

Atarjamat respects the right of all employees to freely associate, form, or join workers' organizations of their choosing, and to engage in collective bargaining, in accordance with applicable national laws. The company maintains an open and constructive approach toward employee representation and dialogue.

Current Practice

Atarjamat has designated **two employee representatives**, one for each department, who act as communication bridges between staff and management. These representatives are elected by the employees and are granted the freedom to carry out their representative duties without discrimination or obstruction.

Where formal unions or collective bargaining mechanisms are not present or legally restricted,

Atarjamat ensures that alternative and independent means for employee representation and consultation are supported and not hindered.

Responsibility

- Director General
- HR & Compliance Manager

Procedures

- Maintain open and regular communication between management and employee representatives.
- Ensure that representatives are given reasonable access and time to carry out their duties.
- Prevent any form of retaliation or discrimination against employee representatives.
- Review employee representation effectiveness during internal audits and feedback sessions.

Standard Legal Entitlements

1. Annual Leave

- 21 working days of paid annual leave after one full year of service.
- Increased to 30 days after 10 years of service or upon reaching the age of 50.

2. Sick Leave

- Up to 90 days of sick leave per year, with pay determined progressively:
 - 75% of wage for first 30 days
 - 85% for the following 30 days
 - May continue up to full period with proper documentation

3. **Maternity Leave**
 - 90 days of paid maternity leave for female employees, paid at 100% of salary.
 - Leave is granted up to **3 times** during total service.
 4. **Rest Days and Holidays**
 - At least 1 full day of rest per week (typically Friday or Sunday).
 - Public holidays are granted in accordance with the official calendar.
 5. **Working Hours**
 - Maximum of 8 hours per day, 48 hours per week.
 - Overtime must be voluntary and paid at:
 - **135%** for regular overtime
 - **170%** for weekends and official holidays
 6. **Social Insurance**
 - All employees are registered in the national social insurance system.
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Additional Company Benefits

7. **Hajj and Umrah Leave**
 - Paid leave is granted for employees performing Hajj (once during employment).
 - Umrah leave is considered based on company scheduling and approvals.
8. **Grief / Bereavement Leave and Support**
 - Leave is granted for the death of a first-degree relative.
 - Financial support is offered to cover part of funeral expenses.
9. **Marriage Leave and Gift**
 - Employees may receive a small financial bonus or gift.
10. **Medical Insurance**
 - Atarjamat provides private health insurance to all employees.
11. **Family-related Flexibility**
 - Special arrangements can be made for employees with caregiving responsibilities, especially mothers.

Disciplinary Deductions Policy

- **Employee wages may not be reduced under any circumstances as a form of disciplinary action.**
- If a disciplinary penalty is deemed necessary, **it shall only apply to performance-based bonuses** or incentive payments, not to the employee's base salary, allowances, or legally entitled benefits.
- All disciplinary actions must be properly documented, communicated to the employee, and approved by HR and management.
- Any deductions applied to a bonus must be proportional, fair, and in accordance with internal disciplinary procedures.
- This policy ensures compliance with Egyptian labor law and protects the financial rights of all Atarjamat employees.

Employee Rights & Benefits

Inclusion of Persons with Disabilities

- Atarjamat is committed to the inclusion and fair treatment of persons with disabilities in accordance with Egyptian Law No. 10/2018.

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- The company currently employs two individuals with **mental disabilities**, who receive full monthly wages even though they are **unable to perform standard job functions** due to their condition.
- This initiative reflects Atarjamat's belief in **equal dignity, community inclusion, and social support**, going beyond legal requirements.
- Atarjamat provides reasonable accommodations and ensures that any future hiring of individuals with disabilities is handled in a way that respects their capabilities, needs, and rights.