

# 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

## 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

The company recognizes the impact it has in its services, through the consumption of natural resources, energy, water, and the generation of waste.

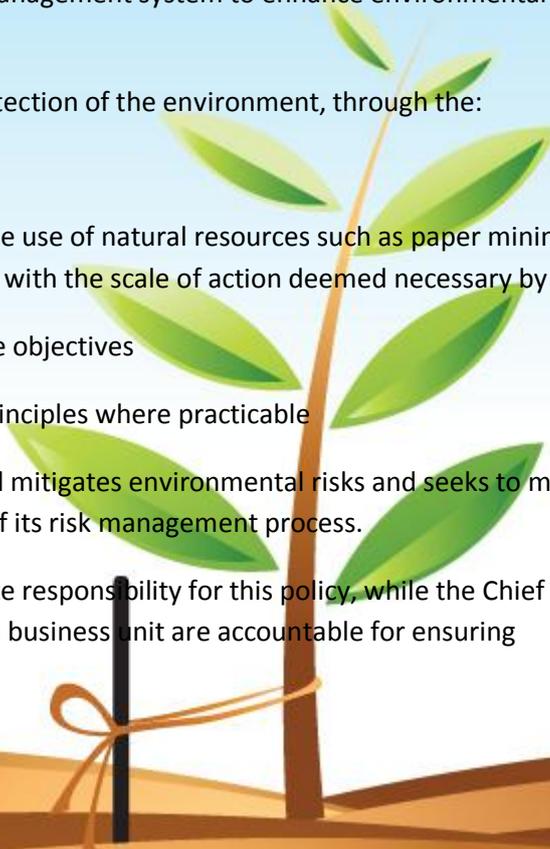
The company is committed to complying with all applicable environmental legislation and other environmental requirements to which we subscribe, and to the continual improvement of the environmental management system to enhance environmental performance.

The company is committed to the protection of the environment, through the:

- Prevention of pollution
- Responsible, efficient and sustainable use of natural resources such as paper 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

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 will be reviewed annually.

## **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

## **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.

## **3.3 Objectives, targets and standards**

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.

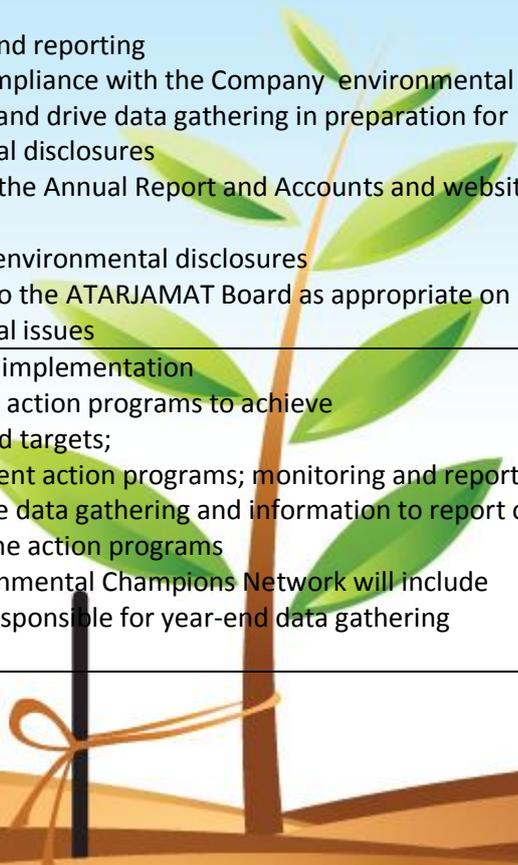
## 4. Implementation and Operation

### 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	<p>Company Environmental Policy</p> <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 as required</li> </ul> <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.

## 4.3 Training

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

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

## 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.



## 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. 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

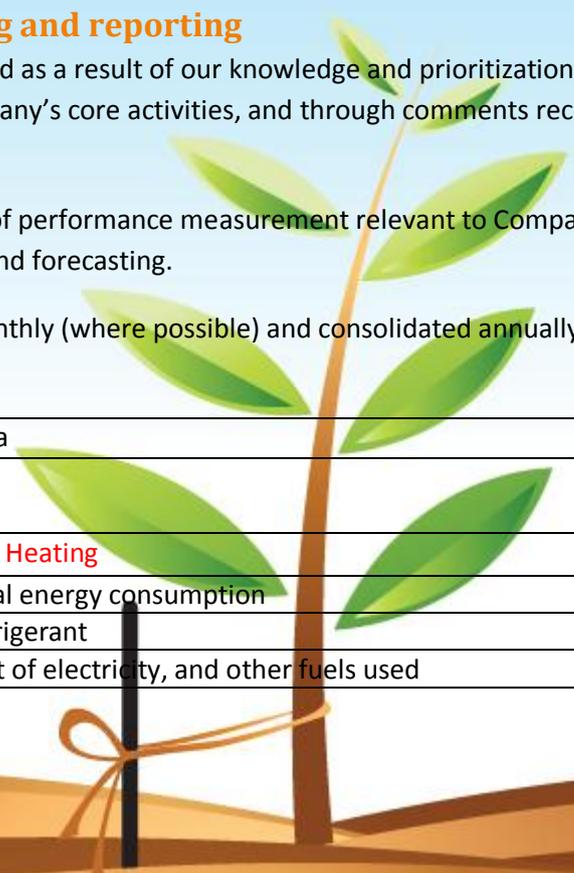
### 5.2 Year end data gathering and reporting

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.

### 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.

