

شركة مهارة للموارد البشرية Maharah Human Resources Company	ESG POLICY	V1.0	Version
		21-Apr-25	Release Date
		D-PY-001120-01	Document Code



## ESG policy

Version 1

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## Chapter 1: Definitions and Objectives

### 1. Company Overview

"Maharah Human Resources Company works to enhance the human resources management sector in the Kingdom by providing workforce services for both the public and private sectors and meeting the local market's needs through an integrated system of services, including business sector services, individual sector services, and localization sector services."

### 2. General Definitions

The following terms mentioned in this policy are defined as follows:

- **The Company** :Maharah Human Resources Company.
- **The CEO** :The person authorized by the Board of Directors with all the necessary powers to carry out the company's work and execute its daily tasks.

### 3. Overview

Maharah, as a leading provider of human capital solutions in Saudi Arabia, is committed to the sustainable development of the communities where it operates. We strive to maximize the value we bring by promoting fair and ethical employment practices, supporting the professional growth of employees and workers, ensuring their well-being, protecting human rights, reducing our environmental impact, and promoting business ethics.

Maharah embraces its Environmental, Social, and Governance (ESG) mission of fostering community solidarity, integrating it into our business as both a strategic priority and a moral duty, guided by the principles of responsibility and cooperation. We align our efforts and actions with the rapidly evolving ESG regulatory landscape, as well as national goals and frameworks, including:

- 3.1 Global Reporting Initiative (GRI)
- 3.2 Sustainability Accounting Standards Board Standards (SASB)
- 3.3 IFRS Sustainability Disclosure Standards
- 3.4 United Nations Sustainable Development Goals (UN SDGs)
- 3.5 United Nations Global Compact Principles
- 3.6 KSA Vision 2030
- 3.7 Tadawul Exchange ESG Disclosure Guidelines

### 4. Scope of the Policy

This policy applies to Maharah, its employees, and subsidiaries, ensuring ESG integration across all operations and geography it operates in. Maharah also encourages suppliers, third party agents and business partners to align with these principles, fostering shared responsibility for sustainability.

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## 5. Purpose of the ESG policy

Maharah's ESG Policy formalizes our approach to ESG, outlining key principles, priorities, and commitments that guide our activities and operations and are reflected in our ESG Strategy. By embedding these approach and principles into decision-making and daily operations, the Policy reinforces accountability, enhances ESG performance, and drives long-term value for Maharah and its stakeholders, while ensuring alignment with both national and international ESG frameworks and agendas.

## Chapter 2: Policies

### 6. Contribution to KSA national goals and vision

Our approach to ESG is aimed at helping the Kingdom achieve Vision 2030 goals and complete its development programs.

Key objectives we strive to contribute to include the following:

- 6.1 Foster values of equity and transparency
- 6.2 Expand vocational training to provide for labor market needs
- 6.3 Create inclusive workforce with opportunities for all
- 6.4 Improve working and living conditions for expats.
- 6.5 Enable integration of people with disabilities in the labor market
- 6.6 Increase women participation in the labor market
- 6.7 Ensure environmental sustainability

### 7. Principles

Maharah adheres to the following principles of responsible business, based on the UN Global Compact (UNGC) and Principles for Responsible Investment (PRI), ensuring alignment with community needs and minimizing negative impact:

#### 7.1 Respect for human rights and fair labor practices

- 7.1.1 We uphold human rights, prevent labor exploitation, and promote fair wages, safe working conditions, and non-discrimination in employment.

#### 7.2 Stakeholder engagement and community development

- 7.2.1 We actively engage with employees, workers, clients, and communities to drive positive social impact and contribute to economic development.

#### 7.3 Integration of ESG into business strategy

- 7.3.1 We embed ESG into corporate strategy and decision-making, aligning sustainability with business priorities, risk management, and long-term growth.

#### 7.4 Ethical and transparent governance

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7.4.1 We maintain integrity, accountability, and transparency, opposing corruption in all forms and ensuring strong governance and compliance.

#### 7.5 Commitment to environmental responsibility

7.5.1 We promote resource efficiency and sustainable business practices while continuously enhancing our environmental efforts.

### 8. ESG strategy and commitments

Maharah's sustainability approach is guided by its ESG Strategy (2025–2030), ensuring long-term growth while managing its environmental, social and governance impact and processes. The strategy strengthens business resilience, enhances stakeholder value, and aligns with the evolving needs of the HR market in Saudi Arabia and the region.

In the society pillar, we aim to empower employees and workers through training and innovation, ensure well-being and inclusive conditions, uphold human rights, and contribute to communities by supporting education, healthcare, safety, and infrastructure.

In the governance pillar, we are committed to strengthening corporate sustainability by fostering ethics, preventing corruption, ensuring data security, and implementing best governance practices.

In the environmental pillar, we strive to reduce our environmental impact by addressing climate change, promoting recycling, and using resources responsibly.

These commitments are reflected in Maharah's ESG Strategy in the form of strategic ESG topics, each supported by clearly defined goals and a set of measurable strategic objectives. Each objective is measured through specific metrics and KPIs, which are used to monitor progress and ensure alignment with the company's strategic business priorities.

The list of strategic topics, their goals, and an overview of the corresponding strategic objectives are as follows:

#### 8.1 Society

##### 8.1.1 Supporting and developing our talent

Goal – Empower our talent by providing continuous training and fostering a work environment that nurtures creativity and innovation.

Strategic objectives focus on:

- 8.1.1.1 Expanding access to professional and upskilling training for employees and workers
- 8.1.1.2 Establishing and maintaining effective internal communication channels
- 8.1.1.3 Developing and implementing a talent management strategy to align workforce skills with business needs
- 8.1.1.4 Achieving and sustaining top-tier employee satisfaction rating scores
- 8.1.1.5 Implementing a performance management program for employees and individual sector workers

##### 8.1.2 Promoting talent wellbeing and ensuring a safe and healthy environment

Goal – Ensure safe, healthy, and supportive work and living conditions for our talent through adherence to the highest safety and welfare standards.

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Strategic objectives focus on:

- 8.1.2.1 Establishing high-standard welfare processes for employees and workers, verified through external audits
- 8.1.2.2 Developing and implementing a comprehensive well-being and mental health support program
- 8.1.2.3 Enhancing worker satisfaction with living conditions

#### **8.1.3 Promoting talent diversity and inclusivity**

Goal – Create a culture of inclusion, embracing diversity across our talent.

Strategic objectives focus on:

- 8.1.3.1 Strengthening employee sense of belonging within the company
- 8.1.3.2 Increasing women's representation in the workforce and management, with a focus on internal leadership development
- 8.1.3.3 Enhancing workplace inclusion and accessibility for individuals with disabilities

#### **8.1.4 Upholding human rights**

Goal – Ensure high human rights standards and minimize risks across all operations and the supply chain.

Strategic objectives focus on:

- 8.1.4.1 Ensuring customer and recruitment agency compliance with human rights standards and labor laws
- 8.1.4.2 Providing comprehensive human rights training for employees and workers
- 8.1.4.3 Conducting regular human rights impact assessments across operations
- 8.1.4.4 Enabling whistleblowing channels through strong grievance mechanisms

#### **8.1.5 Delivering high-quality and inclusive customer experience**

Goal – Consistently enhance service quality and inclusivity to exceed customer expectations in every interaction.

Strategic objectives focus on:

- 8.1.5.1 Enhancing customer satisfaction for individual and corporate clients
- 8.1.5.2 Ensuring prompt customer support response times
- 8.1.5.3 Achieving full accessibility of services and digital channels for clients with disabilities

#### **8.1.6 Supporting local communities**

Goal – Foster local community growth and prosperity by supporting education, healthcare, child welfare, infrastructure and urban development in line with local needs.

Strategic objectives focus on:

- 8.1.6.1 Assessing the impact and effectiveness of social investment programs
- 8.1.6.2 Establishing a corporate volunteering program with active employee and worker participation

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## 8.2 Governance

### 8.2.1 Upholding high ethical standards and practices

Goal – Promote the highest standards of ethics and integrity and maintain a zero-tolerance stance against corruption.

Strategic objectives focus on:

- 8.2.1.1 Ensuring zero confirmed cases of business ethics violations
- 8.2.1.2 Achieving and maintaining compliance with international standards on business ethics
- 8.2.1.3 Providing mandatory business ethics and anti-corruption training for all employees
- 8.2.1.4 Ensuring suppliers and business partners comply with business ethics and anti-corruption standards
- 8.2.1.5 Conducting external audits of business ethics practices

### 8.2.2 Ensuring privacy and data protection

Goal – Ensure that our data security practices consistently meet global industry standards.

Strategic objectives focus on:

- 8.2.2.1 Ensuring zero confirmed cases of data security breaches and leakage
- 8.2.2.2 Providing data security and privacy training for all employees and workers
- 8.2.2.3 Ensuring suppliers and business partners comply with information security and privacy policies

### 8.2.3 Maintaining strong governance

Goal – Embed best practices into corporate governance.

Strategic objectives focus on:

- 8.2.3.1 Ensuring compliance with best corporate governance practices, demonstrated through external assessments, including ESG ratings
- 8.2.3.2 Integrating ESG risk management procedures into corporate governance
- 8.2.3.3 Enhancing women's representation on the Board of Directors

## 8.3 Planet

### 8.3.1 Reducing our environmental footprint: GHG emissions, waste, energy consumption

Goal – Strengthen our approach to climate impact management, energy efficiency, and waste management in alignment with national goals.

Strategic objectives focus on:

- 8.3.1.1 Establishing and maintaining a data management system for carbon emissions, energy, and water consumption

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- 8.3.1.2 Setting GHG emissions reduction targets aligned with SBTi and KSA Net Zero goals
- 8.3.1.3 Implementing a waste management system
- 8.3.1.4 Engaging all employees in sustainable environmental practices through training and recycling initiatives
- 8.3.1.5 Ensuring suppliers adopt and are assessed for environmentally responsible practices

## 9. ESG fundamental topics

There are 5 key topics that serve as the foundation for the successful integration of ESG into our processes and the implementation of the ESG strategy:

- 9.1 Digitalization & innovation:** Embracing digital solutions and innovation to drive sustainability, improve operational efficiency, and enhance the ESG impact across all areas of the business.
- 9.2 Financial growth & stability:** Ensuring the financial strength and stability necessary to support long-term ESG goals and to create shared value for all stakeholders.
- 9.3 Risk management:** Effectively identifying, assessing, and managing ESG-related risks to ensure resilient operations and compliance with global standards.
- 9.4 Transparency:** Committing to clear, consistent, and accountable ESG reporting and communication to build trust with stakeholders and drive continuous improvement.
- 9.5 Stakeholder engagement:** Actively engaging with our internal and external stakeholders (including management, employees, workers, clients, regulators, and others) to align ESG goals, activities, and projects with their needs and expectations, fostering collaboration and positive change.

## 10. ESG Operating Model

Maharah's ESG operating model is overseen by the CEO and the Board of Directors, who approve and authorize strategic ESG ambitions and core documents (including the ESG strategy and this ESG policy), ensuring full alignment with the company's long-term goals. The effective implementation of the ESG strategy and adherence to the ESG Policy is ensured through a management model based on active leadership engagement, centralization of ESG expertise, cross-functional collaboration with accountability measures and performance metrics tied to governance of this policy and the following clear roles and responsibilities:

- 10.1 ESG Department:** serves as the central competence hub, coordinating the execution of the ESG strategy across business functions, providing guidance on integration. Monitors progress and develops communication plans.
- 10.2 Head of ESG:** supervises the cross-functional implementation of the strategy, initiates actions such as the creation of task forces to address specific gaps or topics, identifies gaps in progress, and reports to the CEO with recommendations on adjustments to the strategy and roadmap if required.

Regarding the ESG Policy, the Head of ESG is responsible for maintaining its accuracy and alignment with relevant policies, ensuring timely disclosure of necessary information, overseeing compliance efforts, initiating audits when

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required, and providing regular updates to management on the company's compliance status, and recommending updates on the ESG Policy to the CEO and management.

**10.3 CEO:** provides strategic supervision, oversees the alignment of the ESG strategy with the company's business goals and overall vision, approves key initiatives, and reports to the Board and relevant committees on the progress and performance of the ESG strategy.

**10.4 Audit Committee of the Board:** supports the Board in overseeing the ESG strategy, the integration of ESG factors into overall risk management system, and the accuracy and transparency of ESG reporting.

To enhance leadership collaboration, an **ESG Steering Committee** will be established in 2026, serving as an advisory body under the CEO. The Committee comprising key VPs and GMs will play a critical role in reviewing and pre-approving updated ESG strategy and other key documents, progress, and key initiatives before they are submitted to the CEO.

Effective management of ESG risks is a critical element of our ESG management approach. As part of the ESG Strategy, Maharah aims to build a systematic approach to ESG risk management, which includes ESG risk identification and their integration into the overall risk register, assignment of a responsible department, and creation of mitigation strategies. This also includes escalation mechanisms: in case of realization of an ESG risk, or a potential or actual failure of mitigation measures, the person responsible for this area must notify the Head of ESG, along with the Internal Risk Department, for subsequent actions in accordance with Maharah's risk management procedure.

## 11. Reporting

Maharah is committed to transparent and reliable ESG reporting, ensuring stakeholders access to clear and comparable disclosures on our sustainability performance.

We disclose our ESG performance through:

- 11.1 Regular reporting that tracks progress against ESG targets, highlights key initiatives, and assesses overall impact
- 11.2 Alignment with the leading reporting frameworks and regulatory requirements to ensure adherence to the best practices
- 11.3 Stakeholder engagement sessions to gather insights, address expectations, and refine our ESG practices.

## 12. Dialogue with stakeholders

Maharah maintains open and continuous dialogue with its key stakeholders, including employees, workers, clients, investors, suppliers, recruiting agencies, regulators and others, to ensure transparency, gather valuable feedback, and align ESG objectives with stakeholder expectations.

The ESG Department, in collaboration with Investor Relations, engages regularly with investors to discuss ESG developments, address inquiries, and integrate their perspectives into initiatives. Additionally, Maharah consults other

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stakeholders through surveys, meetings, and direct engagement to ensure its ESG approach remains relevant and effective.

## 13. Other policies

Maharah maintains a comprehensive set of policies that govern various aspects of ESG and business operations, reinforcing our dedication to integrity, transparency, and sustainability. These policies complement our ESG commitments and provide clear guidelines on responsible and ethical business practices.

They include, but are not limited to:

- 13.1 Code of Conduct
- 13.2 Human Rights Policy
- 13.3 Anti-Bribery and Corruption Policy
- 13.4 Privacy Policy
- 13.5 Labor Policy
- 13.6 Training and Development Policy
- 13.7 Reporting Policy
- 13.8 Working Hours Policy
- 13.9 Employee Voice Policy

## 14. Training and communications

All employees shall receive ESG Policy induction training to ensure a clear understanding of its principles. The Policy should be readily accessible through Maharah's internal communication platforms.

Departments and individuals responsible for implementing strategic ESG objectives shall receive targeted training to ensure alignment and accountability.

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## 15. Approval and revision

The core unit responsible for ensuring adherence to this policy and regular assessment of its execution is the ESG department. The department conducts a quarterly review of the policy's implementation to ensure ongoing compliance and effectiveness and provides the results to the Head of ESG.

The Policy shall undergo a formal review and update every two years to ensure its continued relevance and alignment with evolving business needs and ESG objectives.

Responsibility	Business unit
Owner	ESG department
Stakeholders and co-enablers	<ul style="list-style-type: none"> <li>• HR</li> <li>• Workforce department</li> <li>• International recruitment</li> <li>• Call Center</li> <li>• Quality</li> <li>• Corporate Communication</li> <li>• GRC</li> <li>• General Department of Administration Services</li> <li>• Information Technology</li> <li>• Internal audit</li> <li>• Corporate sector</li> <li>• Individual sector</li> <li>• Marketing</li> </ul>
Administration	Board of directors CEO Head of ESG

## 16. Contacts

Contacts in case of any questions:

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