



EMIRATISATION POLICY

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1. Purpose

Small Steps Big Dreams is committed to supporting the UAE's Emiratisation objectives through the recruitment, development and retention of UAE nationals in genuine, productive employment. This policy establishes responsibilities and controls to meet applicable Ministry of Human Resources and Emiratisation (MOHRE) requirements while maintaining the professional, safeguarding and service standards expected at Small Steps.

2. Scope

This policy applies to recruitment, employment, training, performance management and retention activities involving UAE nationals across Small Steps' operations, including its centre, partner schools, home services and authorised remote working arrangements. It applies to HR, Operations, Finance, line managers and employees involved in implementing or monitoring Emiratisation.

3. Compliance with Applicable Requirements

HR shall verify and document the Emiratisation requirements applicable to each relevant MOHRE establishment, taking account of its registered workforce, skilled job classifications, business activities and official notifications.

The Company shall:

- Meet applicable recruitment and retention targets within the required deadlines.
- Maintain accurate employment information and supporting records.
- Monitor changes to MOHRE requirements and update its workforce plan accordingly.
- Escalate any actual or anticipated shortfall to the Head of Operations and Directors promptly.
- Address compliance gaps through genuine recruitment and retention measures.

Targets shall be recorded in the Company's Emiratisation tracker using verified MOHRE information. Company-wide headcount alone must not be used to assume the requirement for a particular establishment.

4. Recruitment and Selection

HR shall actively seek suitable UAE national candidates through appropriate channels, including Nafis, recruitment platforms, educational institutions and professional networks.

Recruitment shall include:

- An approved vacancy and clear job description.
- Defined responsibilities, working arrangements and reporting lines.
- Assessment of qualifications, skills and suitability.
- Verification of required professional licences and credentials.
- Applicable safeguarding checks before deployment.

- A documented selection decision and approved employment offer.

For child-facing, clinical or specialist roles, Emiratisation objectives shall not override professional licensing, competence or safeguarding requirements. Candidates who require development may be considered for appropriate supervised or alternative roles.

5. Genuine and Productive Employment

Every Emirati employee shall hold a genuine role with actual duties, appropriate supervision and documented work expectations.

The Company strictly prohibits:

- Employment arrangements created solely to appear compliant without genuine work.
- Falsifying attendance, payroll, job descriptions, qualifications or employment records.
- Misusing Nafis or other government employment benefits.
- Misrepresenting workforce numbers, job classifications or employment status.

Remote, flexible or part-time arrangements must be properly authorised, documented and operated as genuine employment. HR shall confirm whether the arrangement qualifies towards the applicable Emiratisation requirement.

6. Employment Conditions and Payroll

Emirati employees shall receive valid employment documentation, agreed remuneration, statutory entitlements and fair treatment in accordance with applicable UAE law.

HR and Finance shall ensure:

- Contracts accurately reflect the role, salary, hours and working arrangements.
- Required work permits and employment registrations are maintained.
- Wages are paid on time through the applicable lawful payment arrangements.
- Applicable pension registration and employer and employee contributions are completed with the relevant pension authority.
- Leave, attendance and payroll adjustments are supported by accurate records.
- Changes to employment terms follow the required approval and legal processes.

Government support or incentives shall not be used as a reason to withhold or reduce contractual wages or statutory entitlements.

7. Induction, Training and Development

HR and the line manager shall provide an induction covering:

- Role responsibilities and performance expectations.
- Company policies and reporting procedures.
- Safeguarding, confidentiality and data protection.
- Health and safety and relevant workplace arrangements.
- Systems access and required operational training.

Managers shall identify development needs and arrange appropriate training, mentoring or supervised experience. Where a role requires professional credentials, an agreed development plan may be established, subject to the relevant regulator's requirements.

8. Performance Management and Retention

Emirati employees shall receive clear objectives, regular feedback and fair performance reviews under the Company's performance management procedures.

Managers shall:

- Identify barriers to effective performance early.
- Provide reasonable support, guidance and relevant training.
- Recognise development and progression opportunities.
- Raise retention concerns with HR before they become avoidable departures.

Performance concerns shall be addressed through fair, documented procedures. Emiratisation targets shall not justify withholding employee rights or preventing lawful resignation.

HR shall review exit feedback and recommend improvements where appropriate.

9. Monitoring and Reporting

HR shall maintain an Emiratisation tracker recording:

- Applicable establishment and verified target.
- Relevant workforce and skilled role figures.
- Emirati employees counted towards the target.
- Vacancies, recruitment progress and anticipated joining dates.
- Contract, permit and pension registration status.
- Employee departures and changes affecting compliance.

- Reporting deadlines and outstanding corrective actions.

HR shall review compliance monthly and submit a progress report to the Head of Operations. Risks requiring management action shall be escalated to the Directors promptly.

Recruitment must be planned sufficiently in advance of official deadlines. HR shall verify that appointments satisfy the applicable counting requirements before reporting the target as achieved.

10. Resignations and Employment Changes

Managers must notify HR immediately of an Emirati employee's resignation, proposed termination, transfer or material change to working arrangements.

HR shall assess the effect on compliance, complete required notifications and initiate any necessary replacement recruitment within applicable requirements.

Employment termination and final settlement shall follow lawful procedures. Any replacement appointment must satisfy the same recruitment and genuine employment controls as other appointments.

11. Records and Confidentiality

HR shall retain accurate recruitment, employment, attendance, payroll, pension, training and compliance records under the Company's approved retention arrangements and applicable legal requirements.

Access shall be limited to authorised personnel. Records provided to authorities must be accurate, complete and supported by evidence.

Personal information must be handled in accordance with the Company's Data Protection and IT policies.

12. Reporting Concerns and Policy Breaches

Suspected fake Emiratisation, inaccurate reporting, unpaid wages or misuse of government benefits must be reported promptly to HR or the Head of Operations.

Where the concern involves those persons, it may be reported directly to a Director or the relevant authority.

Good-faith reporting shall not result in retaliation. Breaches shall be investigated fairly and may lead to lawful disciplinary action, corrective measures and referral to competent authorities where required.

13. Approval and Review

This policy takes effect following management approval and communication to relevant employees.

HR shall review it annually and whenever regulatory changes, inspection findings or operational changes require an update. Mandatory UAE law and applicable MOHRE requirements prevail over this policy.

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