

Outsourcing Provider Worker Rights Policy

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Amendment History

Title:	Outsourcing Provider Worker Rights Policy
Responsible Unit:	People and Organizational Development Department

Version	Date	Author(s)	Notes	Revision(s)	Approval(s)
V1.0	March 2024	Sara Samy	Policy Creation	Seyada Mounib	Engy Mansour
V1.1	July 2025	Abdalaziz Mekky	Policy Update	Sara Samy	Seyada Mounib

Purpose

The purpose of this policy is to ensure that workers whom MSA University assigns to third-party clients, when MSA acts as a **supplier or provider of outsourced services**, enjoy their full rights under the Egyptian Labor Law and rights **equivalent to those of the University's own employees**, wherever they work.

The policy sets out how the University safeguards **equity in compensation and benefits, occupational safety and health**, and lawful employment conditions for these workers, and how it verifies that clients respect them.

Scope

This policy applies to all units of MSA University that supply workers or services to external clients under a contract, where the workers are employed by MSA and perform their work at the client's premises or for the client's activities.

It covers all new, renewed, and existing client contracts, and any subcontractor MSA uses to deliver the service.

Policy Statement

MSA University will not use outsourcing as a means to avoid or reduce workers' rights. As the **legal employer**, MSA is responsible for the contract, pay, social insurance, and rights of every worker it assigns to a client, whatever the client's own practices.

Assigned workers will receive the legal minimum under Egyptian law and rights equivalent to those of comparable MSA employees. Where the law requires equal treatment with the client's own workers in the same work area, MSA will ensure that this is met and will price its services accordingly. No client contract may be signed or renewed unless it supports the commitments set out in this policy.

Definitions

Assigned Worker

A person employed by MSA University who is assigned to work at a client's premises or for a client's activities.

Client

Any external organization that receives workers or outsourced services from MSA University under a contract.

Comparable Employee

An MSA employee, or a client employee in the same work area, who performs the same or substantially similar work as the assigned worker.

Contract Owner

The manager responsible for the day-to-day management of a client contract.

Legal and Reference Framework

This policy is based on the following:

- Egyptian Labor Law, its executive regulations, and related ministerial decisions, including the provisions on work assigned to another employer in the same work area
- Social Insurance and Pensions Law
- Decisions of the National Council for Wages on the minimum wage, as in force
- Applicable occupational safety and health regulations and civil defense requirements
- Egyptian regulations on private employment agencies and the licensing of labor supply activities, where applicable
- UN Sustainable Development Goal 8 and the core standards of the International Labour Organization (as guiding principles)

Equity in Compensation and Benefits

Equal Pay for Comparable Work

Assigned workers will receive at least the same basic pay rate, allowances, and overtime rates as comparable MSA employees, and never less than the legal minimum wage. Where the law requires equal treatment with the client's own workers in the same work area, MSA will match the applicable pay and conditions. Pay may not be reduced because of a client's budget, a change of client, or the end of a contract.

Benefits and Leave

Assigned workers will receive benefits equivalent to those of comparable employees, including:

- Annual, sick, official, and statutory leave (including maternity leave)
- Working-hour limits and weekly rest periods
- Continuity of service and entitlements when a worker moves between client assignments

Timely and Transparent Payment

Wages must be paid in full and on time through bank or documented electronic channels, **regardless of when the client pays MSA**. Unlawful deductions, recruitment fees, and the withholding of

workers' documents are prohibited. No retaliation may be taken against any worker who raises a concern.

Contracts and Social Insurance

- Every assigned worker must have a written employment contract with MSA before the assignment starts, stating the role, work location, pay, hours, benefits, and duration.
- Every worker must be registered with social insurance from the first day of work, on their actual wage, and contributions must be paid on time.
- Health coverage required by law must be in place.
- Fixed-term or short-term contracts may not be used to avoid workers' rights.
- Workers may be reassigned between clients only under the terms of their contract and with their notice.

Occupational Safety and Health

MSA remains responsible for the safety of its workers at the client's site. The University will ensure that:

- A **site risk assessment** is completed before the assignment starts, and again for hazardous tasks (work at height, electrical, chemical, confined spaces, hot work, heavy equipment)
- **Personal protective equipment** and training are provided at no cost to the worker, by MSA or the client as set out in the contract
- Workers receive a safety induction from the client, and are informed of hazards, emergency exits, first aid, and reporting channels
- Workers may refuse unsafe work and report it without penalty, and MSA may withdraw workers from an unsafe site
- All accidents, injuries, and near misses are reported to MSA **within 24 hours**, investigated, and followed up with corrective actions, and work injuries are reported to the competent authorities as the law requires

Non-Discrimination and Dignity

- Assigned workers will be treated without discrimination on grounds of gender, religion, disability, origin, or any other protected ground, by MSA and by the client.
- Harassment, forced labor, child labor, and any form of exploitation are prohibited. No one below the legal minimum working age may be employed.
- Workers will have access to a safe and respectful workplace and appropriate facilities at the client's site, and may exercise their lawful right to organize and be represented.

Client Selection and Contract Requirements

Due Diligence

Before signing, the Contract Owner and the HR Department will review the client's legal status, safety record, and ability to provide a safe workplace and meet the contract terms. MSA will decline or withdraw from contracts that cannot be delivered in compliance with this policy.

Mandatory Contract Clauses

All client contracts must include:

- A commitment by the client to treat assigned workers lawfully and without discrimination, and to give them the same working conditions as its own workers in the same work area, as the law requires
- Fees that cover wages, social insurance, benefits, and protective equipment for each role
- The client's safety obligations, including site induction, protective equipment where assigned to it, and reporting of incidents within 24 hours
- MSA's right to visit the site, inspect conditions, and meet workers privately
- A prohibition on the client giving instructions that conflict with the law or with the workers' contracts
- No sub-assignment of MSA workers to another party without MSA's written approval
- MSA's right to withdraw workers, suspend the service, or terminate the contract if worker rights or safety are put at risk
- A worker grievance channel

Pricing

Bids must show the cost of wages, insurance, and benefits for each role. MSA will not offer prices that cannot cover the full legal cost of the workforce.

Monitoring and Verification

The University will verify compliance as follows:

- **Quarterly:** visit to each client site to check safety conditions and working conditions, more often for high-risk work, and review of incidents and grievances
- **Annually and before renewal:** full review of each client contract against this policy

Clients must correct any issue identified within the deadline set by the University.

Non-Compliance and Remedies

- **Minor issues:** written notice to the client and a corrective action plan with a deadline
- **Unsafe or unlawful conditions:** the University may withdraw workers from the site and suspend the service until the issue is resolved

- **Serious or repeated breaches by a client:** termination of the contract
- **Breaches by MSA staff:** any University manager who breaches this policy is subject to disciplinary action under University regulations
- MSA will always meet its obligations to the worker first and will pursue recovery from the client where the contract allows

Grievance and Remedy

- Assigned workers may raise concerns with MSA directly through the channel designated by HR, with the option to remain anonymous.
- The University will acknowledge complaints as per the University grievance policy.
- No worker will suffer retaliation for raising a concern in good faith, whether from MSA or the client.
- Workers retain the right to approach the competent labor authorities and courts at any time.

Roles and Responsibilities

HR Department

- Owning this policy and updating it
- Handling worker grievances
- Conducting verification of client sites and assigned workers
- Ensuring wages and social insurance are paid on time, regardless of the client's payment status

Finance

- Reviewing pricing so that it covers the full legal cost of the workforce

Legal Affairs

- Reviewing client contracts and advising on liability for assigned workers

Health and Safety

- Overseeing site risk assessments, inspections, and incident follow-up

Department Managers (Contract Owners)

- Ensuring day-to-day compliance with the contract and this policy
- Reporting concerns or suspected violations to HR promptly

Policy Review

This policy will be reviewed at least annually, and whenever the Labor Law, its regulations, or good practice change.