

BP-POL-006

Working Time, Wages & Fair Employment Policy

Location-specific contracts, accurate time, lawful rest, overtime and wage payment

Blue Palm pays accurately and on time, records every hour and plans work so that legal limits, rest and human wellbeing are respected.

VERSION	1.0
STATUS	Approved
POLICY OWNER	Nominated Compliance Officer – Mr. Hiua Schuani
APPROVAL AUTHORITY	CEO – Mr. Hiua Schuani
APPLIES TO	Blue Palm personnel and relevant third parties in Federal Iraq, the Kurdistan Region and the UAE/Dubai

1. Purpose and scope

This policy establishes fair, accurate and lawful arrangements for working time, wages, overtime, breaks, rest and employment agreements. It applies to Blue Palm employees and to agency, temporary or contracted labour to the extent Blue Palm controls or is legally responsible for their work.

2. Governing principle

The employing entity and normal work location determine the primary legal schedule, subject to temporary-assignment, free-zone, sector and contractual rules. The Nominated Compliance Officer and payroll owner must confirm the current schedule before issuing or changing terms.

3. Jurisdiction schedule at policy date

Location	Working time and wage baseline
Federal Iraq	Labour Law No. 37 of 2015 generally sets 8 hours per day and 48 per week, prescribed breaks and daily/weekly rest, and overtime rules. Blue Palm's legal register records a general monthly minimum of IQD 350,000 at the policy date; the current binding order must be verified before each pay-cycle setup or change.
Kurdistan Region of Iraq	Labour Law No. 71 of 1987 is treated as the principal applicable labour law at the policy date, generally using an 8-hour day and 48-hour week. KRG public information in 2026 states a minimum monthly wage of IQD 450,000 for unskilled workers. Current KRI law, decrees, sector rules and contracts must be locally confirmed.
UAE / Dubai	Federal Decree-Law No. 33 of 2021 generally sets 8 hours per day and 48 per week, breaks after no more than five consecutive hours, overtime limits/premiums and reduced normal hours during Ramadan under implementing rules. As at June 2026, the UAE had no generally stipulated private-sector minimum salary; agreed wages must be lawful, sufficient and paid through any applicable Wage Protection System or licensing-authority process.

Amounts and summaries above are implementation prompts, not permanent entitlements. The controlled legal register must state the source, effective date, worker category, location, currency and any sector or free-zone variation.

4. Employment agreements and language

- Use a written agreement identifying employer and worker, role, location, start date, wage components, hours, rest, leave, notice and other mandatory terms.
- Do not substitute less favourable terms after recruitment or arrival. Changes require lawful process, written record and genuine agreement where required.
- Provide an understandable copy to the worker. In Federal Iraq employment documents are prepared in Arabic; Kurdish is used alongside Arabic in the Kurdistan Region as required. Migrant workers receive an accessible explanation or translation.
- State whether a benefit is part of wage, an allowance, reimbursement or discretionary benefit; do not use labels to avoid mandatory calculations.
- Collective agreements or customer/project wage rules must be identified during contracting and reflected in payroll where applicable.

5. Recording working time

- Record start, finish, breaks, overtime, weekly rest and relevant travel or on-call time accurately for each worker when applicable.
- Managers may not instruct off-the-clock work, alter time records without explanation or ask a worker to record fewer hours.
- Workers must review records and raise errors promptly; Blue Palm will investigate without retaliation.
- Planned hours must allow legal breaks, daily rest, weekly rest, safe fatigue management and any young-worker restrictions.

6. Overtime and rest

Overtime is used only for a genuine operational need, remains within local limits and is authorised by the designated manager. Emergencies are recorded and reviewed. All overtime actually required or knowingly permitted must be recorded and compensated at the lawful rate or by lawful time off where permitted.

Managers must not plan schedules that depend on routine excessive overtime. Consent must be genuine where required, and a worker must be able to raise fatigue or legal-limit concerns without disadvantage.

7. Wage calculation and payment

- Pay the correct worker directly, on the agreed lawful pay date and in the required currency or approved payment system.
- Give an itemised payslip showing base wage, allowances, overtime, bonuses, deductions, net pay and pay period in an understandable form.
- Make deductions only where lawful, properly authorised and documented. Never use fines, recruitment-fee recovery, deposits or unexplained deductions.
- Correct underpayments promptly, pay any required arrears or premium and document root-cause action.
- Apply equal pay for the same work or work of equal value and document objective reasons for lawful differences.
- Maintain payroll confidentiality while allowing the worker access to their own records and lawful wage information.

8. Supplier, agency and project labour

Before using labour supplied by another entity, Blue Palm must identify the legal employer, applicable wage and hours rules, recruitment chain, permits, fee model and payment method. Contracts require lawful wages, complete time and payroll records, worker access to grievance channels and a right to verify compliance. Federal Iraq Labour Law may create joint responsibility between a main contractor and subcontractor for specified worker rights; commercial contracts do not remove statutory responsibility.

9. Wage or hours concern

A worker may raise a concern to their manager, payroll contact, Nominated Compliance Officer or under BP-POL-003. Payroll errors should be corrected quickly and without requiring the worker to waive other rights. Suspected falsification, coercion, retaliation or systemic underpayment must be treated as a compliance concern.

Roles and responsibilities

Role	Core responsibility
CEO	Approves the policy; sets the tone; authorises high-risk exceptions or relationships; ensures adequate resources and independent escalation.
Nominated Compliance Officer	Maintains the legal register, advice channel, risk records and registers; coordinates training, screening, investigations and annual review.
Managers and supervisors	Apply the controls in daily decisions, create a respectful environment, prevent retaliation and escalate concerns without delay.
All workers	Read and follow the policy, complete required training, keep accurate records, ask when unsure and report suspected breaches.
Payroll / Finance	Maintains the location-specific legal register, validates rates, processes accurate pay, reconciles time and pay and corrects errors.
Scheduling manager	Plans lawful hours and rest, authorises genuine overtime, reviews fatigue and never permits off-the-clock work.
Labour supplier	Pays workers lawfully, provides records and permits, prohibits recruitment fees and allows worker access to Blue Palm grievance routes.

Training, records and monitoring

Training

Induction must cover the parts of this policy relevant to each role. Refresher training is required at least annually for exposed roles and when a material change occurs. Training may be brief and practical, but attendance and comprehension must be recorded.

Minimum records

- Signed terms and accessible-language evidence; wage schedule and legal-register source.
- Time, break, rest, overtime approval and payroll records; payslips and payment evidence.
- Deductions, adjustments, underpayment corrections, grievances and supplier payroll verification.

Proportionate indicators

- On-time, accurate payroll completion.
- Hours exceeding planned or legal thresholds and repeated overtime by individual or team.
- Underpayments, corrections and unlawful-deduction findings.
- Supplier payroll samples completed and remediation closed.

Records must be accurate, access-controlled and retained for the period required by applicable law, contract and Blue Palm's retention schedule. Personal data and sensitive reports must be restricted to those with a legitimate need to know.

Breaches, protection and review

A breach may result in corrective action or discipline up to and including dismissal, subject to applicable law and a fair process. Third-party breaches may lead to remediation plans, suspension, termination, recovery of loss and reporting to a competent authority where required.

Blue Palm prohibits retaliation against anyone who raises a concern, assists an investigation or refuses conduct they reasonably believe would breach law or this policy. Deliberately false or malicious allegations may be addressed through a fair disciplinary process; a concern that is not substantiated is not, by itself, misconduct.

The Nominated Compliance Officer will review this policy at least annually, after a significant incident, and when relevant law, sanctions, licensing conditions or operations change. Material changes require CEO approval.

Legal and standards reference

This section is a concise implementation map, not a complete statement of the law. The current official text, local legal advice and the applicable entity or licence conditions must be checked before relying on a provision.

Instrument	Relevance to this policy
Federal Iraq Labour Law No. 37 of 2015, including Articles 16, 37, 53–71 and 95–105	Governs written terms, wages, equal pay, working time, rest, overtime and young-worker hours in Federal Iraq. official/source text
Iraq Labour Law No. 71 of 1987, as applied in the Kurdistan Region at the policy date	Principal KRI labour framework currently used for wages and working time, subject to current KRG decrees and local confirmation. official/source text
Kurdistan Regional Government labour and social-security update, March 2026	Official KRG statement identifying an IQD 450,000 monthly minimum wage for unskilled workers at the policy date. official/source text
UAE Federal Decree-Law No. 33 of 2021 Regulation of Labour Relations, as amended	Governs UAE working time, overtime, pay and employment relations. official/source text
UAE Government portal: working hours and payment of wages	Current public guidance on private-sector hours, Ramadan reductions and wage-payment arrangements. official/source text