



Migrant Worker Recruitment Policy

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'Accountable' owner: Chief Risk and Legal Officer
'Responsible' owner: Head of ESG



Version Control

Version	Author name	Version changes	Date	Next review date
V1.2	Carly Bilsbrough		March 2022	
V1.3	Anna Kasperska	Added the scope, TVG's commitment, expanded the list of definitions and incorporated Dormitory Guidance for Migrant Workers.	May 2024	May 2025

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1. Policy Statement

This Policy establishes a set of principles and rules adopted by The Very Group Limited ('TVG') in relation to Recruitment for Migrant Workers. This Policy is designed to influence all decisions, actions and other activities that relate to its subject matter.

The primary objectives of this Policy are to:

- Outline applicable legal and regulatory requirements relevant to the subject matter of this Policy,
- Identify key roles and responsibilities for both TVG and its Suppliers,
- Provide workers' housing recommendation for Suppliers.

Related Policies

TVG Code of Conduct

TVG Access to Remedy and Grievance Mechanism Policy

TVG Child Labour and Young Worker Policy

2. Background

Migrant workers, whether domestic or international, play a crucial role in contributing to society by supporting the development of their home communities through remittances and addressing critical labour shortages. However, the process of migration often exposes them to significant risks, including unsafe migration routes, exploitation, and human trafficking. Discrimination and unlawful treatment, such as pay disparities, poor working conditions, and forced labour, further compound these risks.

This policy intends to mitigate these risks and ensure responsible employment of migrant workers, it outlines the necessary due diligence required to uphold our commitment to protecting migrant workers and complying with international standards and national regulations within our supply chain. It sets clear expectations for our suppliers regarding the protection of migrant workers' human and labour rights, safety, dignity, and fundamental freedoms.

Importantly, this policy does not aim to discourage business partners from employing migrant workers but rather seeks to ensure their fair and ethical treatment.

Definitions

Domestic Migrant Worker (also referred to as 'migrant worker')

A person moving within his/her own country to pursue employment.

International Migrant worker (also referred to as 'migrant worker')

A person who is to be engaged, is engaged or has been engaged in a remunerated activity in a State of which he or she is not a national.

Worker

Anyone working for an Employer directly, through a Recruitment Agent or a third party.

Employer

A legal entity that provides any form of (permanent, casual, full or part-time) work in return for remuneration and controls/directs Workers at the workplace.

Recruitment Agent/Labour Recruiter

An employment agency, labour provider, labour broker or any other third party responsible for sourcing, selection, hiring, transportation and/or supply of migrant workers in either sending or receiving countries in return for a fee.

Supplier

An organisation that manufactures or procures goods or services for The Very Group.

3. Compliance requirements

The Very Group is committed to ensuring it complies with all legal and regulatory requirements when conducting its business activities.

This Policy has been developed with direct reference to the 'Dhaka Principles for migration with Dignity'¹ which stipulate equal treatment, no discrimination and that all workers enjoy the protection of employment law.

TVG is committed to fully and consistently support our Suppliers who provide transparency on conditions and practices, report any discoveries of unfair recruitment practices within their own or their Suppliers' operations, and actively engage with us in developing and delivering agreed, time-bound improvement plans where necessary.

4. What does this mean to the Very Group?

This policy applies to the entire TVG supply chain; any supplier and their subcontractors, that manufactures products for TVG, including labour recruiters, employment agencies, and service providers.

We require all suppliers in our supply chain to adopt and implement this policy. We expect all our suppliers to monitor their own supply chains with regards to the responsible recruitment and ongoing employment of migrant labour, full transparency must be provided on current practice and any challenges to comply with our requirements should be shared immediately.

Our commitments

Under this policy, TVG commits to respect the rights of all workers, including migrant workers, in line with the United Nations Guiding Principles on Business and Human Rights², OECD Guidelines for Multinational Enterprises³ and other applicable guidelines, standards and frameworks, through:

- Integrating this policy into internal management systems to ensure consistent implementation, and to communicate this policy to relevant TVG functions and business partners,
- Supporting our suppliers to provide transparency on conditions and practices and actively engage in the process of developing and delivering agreed, time bound improvement plans where necessary.
- Addressing any adverse impacts on human and labour rights specific to migrant workers in our supply chain, including, taking adequate measures for their prevention, mitigation and, where appropriate, remediation. If required or beneficial, our suppliers and other stakeholders will be included in such processes,
- Communicating externally about our efforts, challenges and experience related to the adoption of this policy,
- Using our leverage to ensure that all employees have access to appropriate channels for addressing concerns and complaints and are provided with adequate access to remedy and grievance mechanisms in a language understood by them, while also protecting whistleblowers.
- Supporting our suppliers in safeguarding the rights of migrant workers in case of crisis and emergency.

TVG encourages social dialogue and promotes its suppliers to engage with stakeholders directly including migrant workers and their representatives and if possible, trade unions and civil society organizations. to effectively build their internal policies or practices during remediation procedures. TVG recognises that suppliers and factories may require support to

adopt the provisions in this policy and we are committed to supporting all business partners on their journey of improvement.

Suppliers' commitments⁴

Whenever feasible, suppliers should strive to hire workers directly and refrain from using recruitment agencies. If a recruitment agency is necessary to hire migrant workers, the supplier must ensure that it collaborates with a reputable government-registered recruitment agency holding a valid license issued by the relevant authority.

When recruiting migrant workers, suppliers are fully responsible for ensuring compliance with the following provisions:

- No international migrant worker under the age of 18 shall be recruited or employed as a migrant worker in any capacity within our supply chain.
- Migrant workers' personal files, including right to work, should be maintained and readily available for auditors. Additionally, any documents related to the recruitment process should be shareable with TVG and the auditors to ensure transparency and compliance with regulations.
- Adopt the Suppliers Pays Principle - no recruitment fees or related costs should be charged to, or otherwise borne by, recruited migrant workers and jobseekers.
- If a migrant worker has paid any fees or recruitment costs to the supplier or any associated party, the supplier is obligated to reimburse the full amount to the migrant worker. This reimbursement should be made promptly and without any deductions, ensuring that the migrant worker is not financially burdened because of the recruitment process.
- Ensure that migrant workers do not have their passports, contracts, or other identity documents retained by their employers or any other entity.
- Ensure that migrant workers receive written employment contracts prior to departure from their home country or region. These contracts should be in a language they understand. If a worker is illiterate, they must have received an explanation of the work conditions and salary, or the contract should have been read to them.
- Ensure that labour agents are aware of TVG Code of Conduct and all TVG Policies,
- Ensure effective access to grievance and dispute resolution mechanisms in cases of alleged abuses in the recruitment process and provide appropriate remedies or facilitate access to them.
- Ensure that the right to freedom of association and collective bargaining of recruited migrant workers is respected and that migrant workers are represented in worker committees.
- Respect the freedom of migrant workers to leave or change employment or to return to their countries of origin,
- Ensure all migrant workers are provided with the necessary support and resources to return to their home country at the end of their employment contract. This may involve arranging and covering the costs of transportation, ensuring that all outstanding wages and benefits are paid, and assisting with any necessary documentation or administrative processes related to repatriation.
- Must have written contracts with in-country agents and home-countries agents where possible and shared with TVG.
- Suppliers must inform TVG of all migrant workers used in their supply chain.

If suppliers are found to have breached any of the above, then The Very Group reserve the right to suspend the relationship until these issues are rectified. If suitable progress is not made in remediating issues found, then The Very Group may cease our trading relationship with the supplier indefinitely.

Dormitory Guidance for Migrant Workers⁵

Suppliers are encouraged to support migrant workers to obtain housing through autonomous private agencies, public housing schemes, or cooperatives.

When hostel/ dormitory /accommodation are provided as part of the employment contract, the space offered should be adequate for accommodation and provide a suitable, clean, and safe living environment for workers. If a cost is charged, it should be a reasonable proportion of the workers income. Hostels and dormitories must be registered with the appropriate Government body, as required by law.

Minimum standards are as follow:

- Structural safety and prevention for fire accident must be in place,
- Separate facilities provided by gender,
- Adequate living room, as a minimum 20-35 sq. ft per worker, or the amount required by local law, whichever provides a higher standard
- Comfortable mattress with pillow, bed cover and blanket provided to each worker,
- Adequate lighting during day and night,
- Adequate supply of safe drinkable water,
- Adequate sanitary facilities, as a minimum one toilet, one wash basin and one tub or shower per 6 workers,
- Lockable storage for each worker to secure his/her belongings,
- Cooking area, common dining rooms, canteens separated from the sleeping areas,
- Adequate ventilation and, where appropriate, heating,
- Access to laundry facilities,
- Access to telephone/Wi-Fi or other communication systems at a reasonable price.

Premises should be managed and supervised by a supervisor/warden and inspected frequently to ensure decency, cleanliness, and sufficient maintenance. The results of inspections should be registered and made available for review. A committee composed of workers, a representative of the management, supervisor/warden (and representatives from external organisation/NGO, if possible) is to meet regularly to address concerns and improvement plans. The meeting minutes should be recorded and made available for review. When a worker's contract of employment is terminated, the worker should be entitled to a reasonable period to vacate the premises, in accordance with the law.

5. Footnotes

1. Dhaka Principles for migration with Dignity <https://dhakaprinciples.org/>
2. United Nations Guiding Principles on Business and Human Rights https://www.ohchr.org/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf
3. OECD Guidelines for Multinational Enterprises <https://www.oecd.org>
4. ILO's General principles and operational guidelines for fair recruitment https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_703485.pdf
5. ILO's R115 - Workers' Housing Recommendation, 1961 (No. 115) https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R115