Migrant Labour Policy

Implementation date:	October 2026
Next review date:	October 2027
Accountable owner:	Chief People Officer
Responsible owner:	Head of ESG

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1. Policy Statement

This Policy establishes a set of principles and rules adopted by The Very Group Limited in relation to the Recruitment of 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 requirements and The Very Group's commitments relevant to the subject matter of this Policy
- Identify key roles and responsibilities for both The Very Group and its Suppliers
- Define how The Very Group will comply with the above requirements

Scope

This policy applies to The Very Group's entire supply chain including any supplier and their subcontractors that manufacture products for The Very Group including labour recruiters, employment agencies, and service providers.

Related Policies

The Very Group Code of Conduct

Access to Remedy and Grievance Mechanism Policy

Child Labour and Young Worker Policy

Additional Information

Dhaka Principles for Migration with Dignity

ILO General Principles and Operational Guidelines for Fair Recruitment

ILO Worker's Housing Recommendations, 115

United Nations Guiding Principles on Business and Human Rights (UNGPs)

OECD Due Diligence Guidelines for Responsible Business Conduct

ETI Base Code

2. Background

The Very Group is committed to respecting and protecting the rights of migrant workers throughout its operations and supply chains. 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 aims to mitigate these risks and ensure the 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.

3. Definitions

Migrant Worker
A person who is to be, is or has been engaged in remunerated activity in a State of which he or she is not a national (ILO). This includes both domestic and international migrant workers.

Employer
A legal entity that provides any form of work in return for remuneration, including permanent, temporary, full or part-time work.

Recruitment Agent or Labour Provider
Any private employment agency, labour provider, labour broker, recruitment agency, or other third party that undertakes the recruitment, sourcing, selection, hiring, placement, transportation, or supply of workers on behalf of an employer. This includes entities involved

in the recruitment and employment of migrant workers in either sending or receiving countries, as well as any agents, sub-agents, or intermediaries acting on their behalf (ILO).

Supplier
An organisation that manufactures or procures goods or services on behalf of The Very Group.

4. Key requirements

The Very Group is committed to upholding the requirements of this Policy and expects all suppliers to comply with its standards and requirements. The Very Group and its suppliers must comply with all applicable laws and regulations, and where national law differs from international standards, apply the higher standard where legally permissible. This Policy has been developed with direct reference to the Dhaka Principles for Migration with Dignity which stipulates equal treatment, no discrimination and that all workers are protected under employment law.

Key requirements of this Policy are:

- Where migrant labour is used, suppliers must ensure the responsible recruitment of migrant workers
- Suppliers must respect the rights and freedoms of migrant workers
- Suppliers must identify, prevent, mitigate and remediate risks relating to migrant labour
- Where accommodation is provided, suppliers must ensure migrant workers have access to safe, decent and legally compliant housing and support

5. What does this mean to The Very Group?

The Very Group will support our suppliers who provide transparency, disclose any discoveries or risks within their operations or supply chain, and actively engage with us in ongoing due diligence and delivering remediation where necessary. The Very Group recognises that suppliers and factories may require support to implement the requirements of this Policy and is committed to providing appropriate guidance to drive

compliance and continuous improvement.

Under this Policy, The Very Group is committed to respecting the rights of migrant workers, in line with the UNGPs, OECD Due Diligence Guidelines and other applicable guidelines, international standards and frameworks.

The Very Group is committed to:

- Integrating this Policy into internal management systems to ensure effective and consistent implementation
- Communicating this Policy to relevant internal and external stakeholders
- Supporting our suppliers in providing transparency on working conditions and recruitment practices, and actively engaging in the development and delivery of agreed, time-bound improvement plans where necessary
- Ensuring that migrant workers 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 protected from retaliation
- Addressing adverse human and labour rights impacts affecting migrant workers in our supply chain, including taking appropriate measures to prevent, mitigate and where necessary remediate harm, involving relevant stakeholders throughout the process
- Supporting our suppliers in safeguarding the rights and wellbeing of migrant workers in case of crisis and emergency
- Communicating externally about our efforts, progress, challenges and learnings related to the implementation of this policy

The Very Group encourages social dialogue and promotes its suppliers to engage with stakeholders directly including migrant workers, their representatives and where possible, trade unions and CSOs to effectively strengthen their management systems, recruitment and employment practices.

6. What does this mean for suppliers?

The Very Group requires all suppliers in the supply chain to adopt and implement this policy. Suppliers are expected to monitor and conduct due diligence on their own operations and

supply chains to identify, prevent, mitigate and address risks regarding recruitment and employment of migrant labour. Suppliers must provide full transparency on current practices and must notify The Very Group immediately if they become aware of or suspect any instance of non-compliance with our requirements.

Wherever feasible, suppliers should strive to hire workers directly. Where a recruitment agency is necessary, the Supplier must ensure that it uses a reputable, government-registered recruitment agent that hold all relevant, valid licenses issued by the relevant authority.

When recruiting migrant workers, the Supplier is fully responsible for ensuring compliance with the following requirements:

- 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 (Appendix A).
- 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 The Very Group Code of Conduct and all 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.
- Ensure migrant workers have written contracts with in-country agents and home-country agents where possible and shared with The Very Group.
- Suppliers must inform The Very Group where migrant workers are used in their supply chain.

Dormitory guidance for migrant workers

Suppliers are encouraged to support migrant workers to obtain housing through autonomous private agencies, public housing schemes, or cooperatives. When accommodation is provided as part of the employment contract, the space offered should be a suitable, clean, and safe living environment for workers. If a cost is charged, it should be a reasonable proportion of the worker's income. Accommodation must be registered with the appropriate government body, as required by law.

The Very Group expects accommodation to meet the following standards:

- Measures for structural safety and fire prevention must be in place
- Separate facilities provided by gender
- Adequate living space, 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 the 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 their belongings
- Cooking area, common dining rooms and 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 or warden and inspected regularly to ensure they remain safe, decent, clean and adequately maintained. The results of inspections should be documented and made available for review on request.

A committee comprised of workers, management representatives, the supervisor or warden should meet regularly to address concerns and agree improvement actions. Where feasible, representatives from external organisations or NGOs may also participate. Meeting minutes should be recorded and made available for review on request.

Where a worker's contract of employment is terminated, the worker should be provided a reasonable period to vacate the premises, in accordance with the applicable laws.

If the Supplier is found in breach of this Policy, then The Very Group reserves 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.

Appendix A: Example recruitment fees or related costs

All suppliers to The Very Group must adopt the Suppliers Pays Principle: no recruitment fees or related costs should be charged to, or otherwise borne by, recruited international or domestic migrant workers and jobseekers.

Fees that must be covered by the Supplier include (but not limited to):

- Recruitment agency fee
- Passport
- Medical check-up and system service charge
- Destination country entry visa fee, levy or any additional immigration fees incurred
- Welfare fund contribution to foreign employment promotion board
- Insurance
- Pre-departure orientation training
- Legal documents & processing fee
- All transport in sourcing and destination country or region
- Accommodation during transit from sourcing to destination country or region
- Interview costs including transport to and from the interview and accommodation
- Food and drink during recruitment process