



**Our Approach to Responsible Recruitment:
Migrant & Contract Worker Policy**

Version 3

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1. Definitions

Destination Country/Territory – the country/territory where the Migrant Worker will work.

Direct employment - an arrangement where a Worker is employed directly by the Supplier.

Discrimination - any form of unequal treatment that is not permitted by law; to include unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation. Discrimination also includes discrimination on the grounds of work status i.e. part-time Worker, fixed term employee, agency Worker or union membership.

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

Forced or Compulsory labour - all work or service which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.

Indirect employment - an arrangement where a Worker continues to be employed or managed by an agency or Labour Provider while they are working for the Supplier.

Labour Provider - an organisation that employs or manages Workers on behalf of a Supplier.

Migrant Worker - a Migrant Worker is a person who migrates from one territory or country to another in order to seek employment.

Recruitment Agencies - an organisation that arranges work for Workers in return for a fee.

Recruitment Fees – are the costs incurred in the recruitment process in order for workers to secure employment, as defined by the ILO (outlined below). Sending Country/Territory – the home country, territory or region from which the Worker has migrated.

Supplier - an organisation that manufactures or procures goods or services.

Worker - anyone who is doing work for an Employer, either directly, through a Labour Provider or through a third party

ILO Definition of Recruitment Fees and Costs: For employers to cover

Recruitment Fees		Covers recruitment, referral and placement services that can involve advertising, disseminating information, arranging interview, submitting documents for government clearances, confirming credentials, organising travel and placement into employment.				
Medical Costs	Insurance Costs	Skills & Qualifications	Training and Orientation	Equipment Costs	Travel and Lodging	Administrative Costs
• Medical examinations • Tests • Vaccinations	• Mandatory government insurance • Health and safety of workers • Enrolment in Migrant Welfare Funds	• Language proficiency tests • Skills and qualifications tests • Certification or licensing	• Mandatory training • Pre-departure and post-arrival training • On-site training	• Tools • Uniforms • Safety gear	• Including for training, interviews, consular appointments • Relocation • Return or repatriation	• Application and service fees • Employment contracts, passports, IDs, visas, background checks, security & exit clearance, banking services, work & residence permits

Source: <https://iriscertification.org/wp-content/uploads/2022/03/Briefing-Note-Overview-of-IRIS-Standard-December-2021.pdf>

2. Context

Our ethical trading and human rights vision is to improve the lives of workers in our supply chain.

We believe that workers should enjoy an ethical, fair, responsible and dignified recruitment process.

There is growing recognition that risks around workers being charged excessive fees, given misleading information about a job offer, or having documents retained exist. We believe that these risks can also be compounded for migrant workers during the recruitment process as they may be more susceptible to inadequate working and living conditions at the destination, often with limited options but to remain in exploitative conditions, sometimes in situations linked to forced labour.

Princes supports the **Employer Pays Principle** which states that: **No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer.** Princes also supports the Dhaka Principles for Migration with Dignity which provides a set of key principles that employers and recruiters should respect in order to uphold the human rights of migrants.

The employment of Migrant Labour is becoming increasingly important in the global supply chain as workers seek better opportunities to provide for their families and futures. Migrant workers may be found in supply chains where local labour availability is declining, where there are well-established immigration routes through agencies, or where there are high levels of immigration e.g. due to economic hardship or conflict.

Migrant Workers are often recruited through agencies in their home country or territory and are also often employed “indirectly” as Contract Workers, working for Labour Providers.

This policy is intended to help Suppliers to Princes Limited safeguard the rights and welfare of Migrant and Contract Workers in their supply chains and also manage the risks and

responsibilities associated with the indirect employment of Migrant and non-Migrant Workers.

Migrant Workers are vulnerable in a number of ways:

- Lack of fluency in the local language can impair training, in particular relating to essential safety information;
- Poor understanding of employment legislation can lead to Migrant Workers not being aware of their legal rights;
- Fees paid to Recruitment Agencies can lead to a situation of bonded labour where a Migrant Worker is obliged to continue working to repay a recruitment fee;
- Lack of full legal employment status can lead to Migrant Workers being exploited;
- Migrant Workers may not have access to welfare and health facilities in the host country;
- Migrant Workers may accept inferior employment terms, or be more vulnerable to discrimination than domestic Workers;
- Accommodation provided for Migrant Workers may not be suitable.

Contract Workers are vulnerable in a number of ways:

- Labour Providers may not be aware of, or may not implement international labour standards.
- The workplace culture within a Labour Provider's organisation may not be the same as for Workers who are directly employed.
- Contract Workers are often less secure in their employment, may have less rights in the workplace, may suffer discrimination and may be less-well represented on Worker committees.
- Contract Workers may not receive the same level of (essential) training.
- The responsibility for Contract Workers' welfare may be unclear.
- Independent monitoring and auditing often fails to assess the conditions of Contract Workers.

3. Responsibilities

Suppliers are responsible for making sure that Migrant and Contract Workers are employed responsibly, that they are not indebted to agencies or their Employer, that they receive adequate training in languages they understand and that their welfare and rights are safeguarded.

Suppliers are also responsible for informing Princes of the use of Migrant and Contract Workers through the Self-Assessment Questionnaire contained within the Supplier Ethical Data Exchange (Sedex) platform and for communicating any situations where these guidelines are not being met.

Princes holds Suppliers responsible for carrying out sufficient and effective due diligence on all manufacturing sites under their ownership or control, to highlight any offences under the UK Modern Slavery Act (2015).

Suppliers must report offences to Princes immediately. A failure to report offences, or a strong suspicion of an offence, could lead to termination of business with Princes.

4. Principles

4.1 Migrant Workers must have a legal right to work in the destination country.

4.2 Recruitment Agencies and Labour Providers must be reputable and responsible.

4.3 Workers shall not be required to pay Employers' or agents' recruitment fees or other related fees for their recruitment and must not be bonded through other loans or fees.

4.4 Working conditions and accommodation must safeguard Migrant Workers' safety, welfare and rights.

4.5 The responsibility for training Migrant and Contract Workers must be well-defined. Training must be adequate and in a language that is understood.

4.6 Throughout the supply chain, there must be zero tolerance of exploitation, forced or compulsory labour.

Please see section 5 on suggested checks for the above Principles.

5. Suggested Checks for Suppliers who use Migrant or Contract Workers

Princes proposes the following checks are carried out by suppliers who use, or intend to use, Migrant or Contract Workers.

5.1 Migrant Workers must have a legal right to work in the destination country.

- Carefully check that all Migrant Workers have a legitimate right to work, before they are employed, and before they leave their destination country. Become familiar with immigration legislation and legally required work permits.
- Be aware of the expiry date of passports and temporary work permits/visas and ensure that Migrant Workers obtain renewal of permits before their expiry.
- All fees pertaining to the application of work permits and visas must be paid for by the Employer, not the Worker.
- Help Migrant Workers enrol in obligatory state social security and taxation systems, including helping with the set-up of bank accounts.

5.2 Recruitment Agencies and Labour Providers must be reputable and responsible.

- Invest time to fully understand how Migrant and Contract Workers are recruited, what fees they have paid, what loans they need to repay and how they have travelled to the destination country/territory. Share these details, when obtained, with Princes so we can also better understand the challenges around fees within the recruitment process.
- Limit the number of Recruitment Agencies or Labour Providers used. If a certification system exists, we suggest only using certified organisations.
- Communicate standards to Recruitment Agencies/Labour Providers and check that professional recruitment and employment practices are being followed.
- Do not receive or employ Migrant Workers who have not been recruited through a reputable organisation.
- Send Recruitment Agencies/Labour Providers a copy of the Princes Ethical Trade & Human Rights Policy and the Princes Migrant and Contract Worker Policy.
- Ensure that commercial Contracts with Recruitment Agencies/Labour Providers include adequate clauses covering a zero-tolerance approach to exploitation, forced or compulsory labour.

5.3 Workers shall not be required to pay Employers' or agents' recruitment fees or other related fees for their recruitment and must not be bonded through other loans or fees.

- When budgeting for employment costs relating to Migrant Workers, ensure that this includes recruitment fees, renewal fees, transportation and other costs associated with the recruitment and use of Migrant Workers
- Migrant and Contract Workers should not have to pay a deposit to obtain employment.
- Set up systems to pay Recruitment Agencies directly for Migrant Workers' agency/recruitment fees and travel costs, avoiding the need for the Migrant Worker to make a payment.

- All wages should be paid directly to the Worker and not through a third party.
- Pay the cost of a flight or alternative safe transport home at the end of a Migrant Worker's contract and also pay travel costs for bona-fide compassionate leave. Wages owing must be paid in full at completion of contract, before the Migrant Worker returns home (exceptions may apply in the event of a sudden departure e.g. for compassionate leave).
- Agree how to pay a Migrant Worker any outstanding wages if they need to leave suddenly to travel home.

5.4 Working conditions and accommodation must safeguard Migrant and Contract Workers' safety, welfare and rights.

- Provide Migrant and Contract Workers with the same opportunities and employment conditions as other Workers, including the same rates of pay for comparable job roles. Be proactive in creating equal opportunities.
- Migrant and Contract Workers must have the same freedom as local Workers to leave employment or seek work elsewhere. Do not withhold any money from Migrant or Contract Workers or introduce any other form of restriction that may restrict this freedom.
- Migrant and Contract Workers must always be able to retain their own passport or identification papers and work permits. Only photocopies of passports and/or identity papers should be kept on file by the company. Where Workers ask that these are held for safekeeping, documents must be made available to the concerned Worker within 24 hours. A written record of the Worker's agreement to this must be kept.
- Lockable storage must be provided in Workers accommodation to facilitate Worker's safe retention of their papers.
- Migrant and Contract Workers should be given a clear understanding of their employment and living conditions prior to signing a contract. Where the Worker is illiterate, the terms and conditions and other employment policies must be clearly explained in their own language. Good practice is to show potential Workers a video of working and living conditions.
- The employment contract should be signed with each Worker in the Worker's sending country/territory. Explain basic employment rights to Migrant and Contract Workers. In particular, make them aware of how to raise a concern or grievance and how to obtain medical, financial or personal advice.
- Check that accommodation used by Migrant and Contract Workers is safe and hygienic. Where possible, help Migrant Workers to find suitable accommodation and to access local healthcare facilities.
- Ensure that Migrant and Contract Workers are represented on Worker committees, health and safety committees and in other workplace communications. Contracts and Worker handbooks should be translated when necessary.
- Encourage Migrant and Contract Workers to join Unions, Worker committees and to participate in collective bargaining processes.

5.5 The responsibility for training Migrant and Contract Workers must be well-defined. Training must be adequate and in a language that is understood.

- Ensure that training is given by the manufacturer in a language that Migrant Workers understand.
- Ensure that essential safety training is included in inductions, and that Migrant and Contract Workers fully understand safety procedures such as alarms, evacuations.

5.6 Throughout the supply chain, there must be zero tolerance of exploitation, forced or compulsory labour.

- All cases or suspected cases must be reported immediately to Princes
- Agencies/Labour Providers implicated in such cases must be investigated.
- Commercial relationships must be terminated if offences are not dealt with in a timely manner.

6. Grievance Mechanisms

Within Princes, we operate a secure and confidential platform for all colleagues to raise any concerns they may have in relation to potential breaches of our Code of Conduct, food safety practices, policies & procedures, and/or expected ways of working including unethical behaviours, such as recruitment fees & debt bondage.

We expect that our suppliers have similar mechanisms within their organisations where workers can safely raise concerns related to the commission or suspected commission of an unlawful or unethical act.

Where suppliers are unable to provide this mechanism, we encourage suppliers and their workers to raise concerns directly and confidentially with Princes. This can be done via suppliers' regular contact or by contacting ethical.trading@princes.co.uk where enquiries will be treated seriously and in line with best practice and applicable law and as far as possible, confidentially.

For further information please contact Princes Corporate Relations team via:
ethical.trading@princes.co.uk

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Signed by: David McDiarmid (Corporate Relations Director)

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