

Policy on Responsible Recruitment and Fair Treatment of Migrant Workers

1. Introduction

At CreatePins, we are committed to preventing and eliminating all forms of forced labor, human trafficking, and worker exploitation throughout our supply chain. We recognize that migrant workers may face an increased risk of exploitation, particularly through unethical recruitment practices that can lead to recruitment-related debt, debt bondage, and other forms of coercion.

We are committed to ensuring that migrant workers do not pay recruitment fees or related costs to obtain or maintain employment. This commitment is guided by the **Dhaka Principles for Migration with Dignity**, which promote respect for migrant workers' rights throughout the migration process, and the **Employer Pays Principle**, which establishes that workers should never have to pay for their jobs.

Our commitment to responsible recruitment and the fair treatment of migrant workers is reflected in our expectations for suppliers and business partners. We expect all relevant parties to uphold ethical recruitment practices, protect workers' rights, and take effective measures to prevent and address recruitment-related exploitation.

These commitments are supported by our Workplace Standards and Guidelines on Employment Standards (Employment Guidelines), which outline our expectations regarding labor rights, responsible recruitment, and the elimination of forced labor and exploitative employment practices.

2. Scope and Application

This policy applies to:

- All CreatePins suppliers, subcontractors, and business partners.
- All labor recruiters, brokers, agents, and sub-agents involved directly or indirectly in recruiting or employing workers for CreatePins production.
- Migrant workers at all levels of our supply chain where our business relationships or leverage enable us to influence recruitment and employment practices.

This policy covers the entire migrant worker journey, including recruitment, hiring, deployment, employment, contract renewal, termination, and return or onward migration.

We review this policy periodically to ensure that it remains aligned with applicable standards, evolving industry expectations, and responsible business practices.

3. Policy Implementation

3.1 Elimination of Recruitment Fees and Related Costs

CreatePins requires that migrant workers are not charged recruitment fees or related costs to obtain or maintain employment. Such fees and costs include, but are not limited to:

- Fees charged by labor recruiters, brokers, agents, or other intermediaries.
- Job placement and recruitment service fees.
- Medical examinations and skills assessments.
- Pre-departure orientation and training expenses.
- Travel, visa, and work permit costs.
- Deposits, forced savings, or wage deductions associated with recruitment or employment placement.

These costs must be borne by the employer or supplier, as applicable, and must not be transferred to workers, regardless of whether such charges are permitted under local law.

Our approach combines preventive measures to avoid future harm with effective remediation for workers who have already been affected by unethical recruitment practices.

Since 2020, many of our suppliers have taken steps to implement responsible recruitment practices, including adopting no-fee recruitment policies, strengthening oversight of labor recruiters, and improving communication with workers. These efforts have helped address recruitment-related risks for migrant workers.

However, we recognize that workers recruited before the implementation of no-fee practices may continue to experience the financial consequences of recruitment-related debt. Responsible recruitment therefore requires not only preventing future violations but also addressing past impacts.

3.2 Reimbursement of Recruitment Fees and Related Costs

CreatePins expects suppliers to provide reimbursement for recruitment fees and related costs paid by currently employed migrant workers to obtain or maintain their employment, regardless of when they were hired.

Suppliers are expected to follow these principles:

- **Eligibility:** Reimbursement must be available to all currently employed migrant workers who paid recruitment fees or related costs, including workers hired before a supplier or country introduced a no-fee recruitment policy.

- **Transparency:** Reimbursement procedures, eligibility criteria, and repayment arrangements must be clearly communicated to affected workers.
- **Worker protection:** Reimbursement must be carried out without retaliation, coercion, discrimination, or other adverse consequences for workers who raise concerns or seek repayment.
- **Effective remediation:** Suppliers must make good-faith efforts to identify affected workers, assess the fees and costs they paid, and establish and implement appropriate reimbursement plans.
- **Access to remedies:** Reimbursement does not restrict or replace workers' access to grievance mechanisms or other appropriate remedies for violations of their rights.

Where appropriate, suppliers are encouraged to collaborate with relevant industry initiatives and other stakeholders to support effective identification, reimbursement, and remediation.

3.3 Responsible Recruitment Practices

Suppliers are expected to establish and maintain effective due diligence, oversight, and management systems to ensure that recruitment practices comply with this policy.

These systems should include, at a minimum:

- Conducting due diligence on all labor recruiters, brokers, agents, and sub-agents.
- Establishing written agreements that explicitly prohibit charging recruitment fees or related costs to workers.
- Regularly monitoring recruitment practices, associated costs, and compliance with no-fee requirements.
- Conducting worker interviews in safe, accessible, confidential, and culturally appropriate ways.
- Maintaining accurate documentation and records sufficient to demonstrate compliance.
- Establishing procedures to identify, investigate, and address recruitment-related risks and violations.

Where recruiters, brokers, agents, or other intermediaries are found to violate this policy, suppliers are expected to take appropriate corrective action, prevent further harm, and ensure that recruitment practices comply with responsible recruitment principles.

Additional guidance is provided in our Guidelines on Employment Standards (Employment Guidelines).

3.4 Worker Communication and Employment Contracts

Suppliers must ensure that migrant workers receive clear, accurate, and written information about their recruitment arrangements and employment conditions. Employment contracts must be provided before workers depart their country of origin, written in a language they understand, and consistent with the actual terms and conditions of employment.

Suppliers must also ensure that migrant workers receive appropriate information and orientation regarding their rights and protections under this policy, including:

- The prohibition of recruitment fees and related costs.
- Eligibility for reimbursement of recruitment fees and related costs.
- Available grievance and complaint mechanisms.
- Protection against retaliation for raising concerns or reporting violations.

Workers must have access to understandable information that enables them to make informed decisions about their employment and seek assistance when necessary.

3.5 Freedom of Movement and Document Retention

Suppliers must respect migrant workers' freedom of movement and must not confiscate or retain their original identity documents, passports, travel documents, or work permits as a means of restricting their freedom or preventing them from leaving employment. Where document storage is required by law or requested by a worker, the arrangement must be voluntary, appropriately documented, and free from coercion. Workers must be able to access and retrieve their documents freely and without unreasonable delay or restriction at any time.

4. Policy Monitoring, Enforcement, and Compliance

CreatePins is committed to supporting the effective implementation of this policy through ongoing monitoring, engagement with suppliers, and appropriate corrective action when risks or adverse impacts are identified.

We expect suppliers and relevant business partners to cooperate in good faith, provide accurate information when requested, and take timely action to address identified non-compliance.

Where necessary, CreatePins will work with suppliers to identify root causes, develop corrective action plans, and monitor progress toward effective resolution. Failure to address serious or repeated violations may result in further action consistent with our supplier requirements and business relationships.

Through these efforts, CreatePins aims to promote fair, transparent, and ethical recruitment practices that protect the rights, dignity, and well-being of migrant workers throughout our supply chain.

We remain committed to continuous improvement and to working with our business partners to prevent forced labor, eliminate exploitative recruitment practices, and support the fair treatment of all workers.