

HOPS Responsible Recruitment Policy

Introduction and Scope.

This policy outlines HOPS commitment to ensure all workers within our operations and supply chains are recruited and supplied, ethically and professionally. The policy defines the practise that HOPS adopts, ensuring the protection of all workers throughout their application, recruitment, and subsequent placement.

In order to deliver on this policy, HOPS expects the same commitment from all business partners, and will monitor conformity with such expectations. Businesses upon which our extended expectations fall include:

- Suppliers and Service Providers
- Labour Providers or Recruiters
- Recruitment Intermediaries (and sub-agents)
- Government departments and Ministries.
- Organisations which provide services for workers, e.g. health centres, insurance providers, visa processing providers/relevant authorities, travel agents, travel providers, skills certification agents/training providers, translation/interpretation agencies, accommodation agents and any other relevant business partners
- Labour User/Employer clients

Policy Commitments.

HOPS is committed to embedding the following Responsible Recruitment Pillars and Standards into our operations and supply chains:

Professional Pillars

- a) HOPS only work with recruiters, government departments and sub-contractors with a business structure, business model and governance compatible with operating legally, ethically, and sustainably.
- b) Ethical standards of recruitment and labour supply are embedded through effective management systems.
- c) All worker recruitment and employment processes, of suppliers and clients, are managed within the Gateway platform supplied by TwoKnights Ltd.
- d) Open and transparent relationships are encouraged, developed, and maintained between clients, suppliers, and recruiters who work together strategically for mutual benefit.
- e) A worker-centred approach is taken to ensure high levels of worker job satisfaction, engagement and to protect their rights.

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- f) Audits and due diligence checks are completed before the use of any recruitment partner supplying labour to HOPS, and then subsequently completed on regular intervals throughout the supply relationship with the recruitment partner. These checks are a combination of a formal audit procedure undertaken along with ad-hoc spot checks on touch points chosen by the compliance team.

Ethical Standards

1. HOPS do not recruit workers from countries in which it requires its citizens to obtain its permission to leave.
2. HOPS do not recruit workers from countries where a tourist visa to the UK is more expensive than an SWS visa.
3. HOPS positively engages with countries whose governments are interested in our recruitment opportunities but who do not wish to control it.
4. No recruitment fees or related costs are paid by workers, and where evidence of fee-charging is discovered, workers are reimbursed by the party found to have charged them.
5. Job offers are clear and accurate. All workers understand both the nature of work required and the terms and conditions related to the job.
6. The collection, storage, and processing of workers personal data accords with national law and the principles of confidentiality, proportionality, and necessity.
7. Workers already living local to the workplace are given fair access to work.
8. No child labour is used.
9. Workers have the legal eligibility to work in the country, region, and job role, and for the client, they are recruited/supplied for.
10. 'Imposters' and 'hidden' workers are prevented.
11. Workers are employed/engaged in a formal and lawfully recognised relationship appropriate to their working arrangements and they are offered regular work.
12. All workers are paid for all of their working time, on time, and in accordance with national law and their contract/assignment details form.
13. All workers receive the paid holiday to which they are entitled without detriment.
14. All workers receive contractual and statutory benefits to which they are entitled to without detriment.
15. Workers employment taxes and social costs are accurately calculated and paid to the appropriate authority in a timely manner.
16. Workers working time is managed and does not exceed relevant legal and contractual limits.
17. All workers duties and work environment is safe.
18. Accommodation is safe, hygienic, meets resident agency workers basic needs and accords with relevant legislation.
19. Transport provided for workers is safe and aligned with relevant national laws and guidance.
20. Workers right to freedom of association is respected during their recruitment and supply.
21. All workers receive fair and equal opportunity and treatment during their recruitment and supply.
22. Workers are protected from mistreatment at work, including discrimination, harassment and bullying during their employment through HOPS.

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23. Workers conduct and capability issues are managed consistently, proportionately and in a timely, professional, and unbiased manner.
24. Appropriate remedy is accessible to all workers during their working time with HOPS.
25. Workers are not unreasonably restricted from taking up employment opportunities with the Labour User they are supplied to or within the scheme rules.
26. Termination of workers contracts is handled responsibly, with workers receiving all outstanding pay and benefits to which they are entitled.
27. Proactive steps are taken to reduce the risk of workers being subjected to forced labour, trafficking or other hidden third-party exploitation during their recruitment and work with HOPS. In circumstances in which such instances are found, HOPS will take appropriate and necessary actions.

HOPS is committed to embedding the fair work and responsible recruitment standards listed in the six-step framework below:

1. We commit to responsible recruitment by defining senior level accountability and operational roles and responsibilities, introducing the necessary policies and procedures, and communicating our commitment internally and externally.
2. We have an audit plan in action to assess risks in meeting the responsible recruitment standards in our operations and supply chains.
3. We will take action to deal with any identified risks, provide refresher training from any weaknesses found, learn from such instances, and implement preventative measures and controls to avoid re-occurrence.
4. Provide remedy for any issues identified through a people-centred approach.
5. Monitor the progress we make with reviews documented and action plans and commit to continuous improvement.
6. Communicate openly and transparently about the progress we make and any challenges we face, working with our business partners to share key learnings.