

Responsible Recruitment Policy

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1. STATEMENT AND SCOPE

This Policy sets out:

- Frontline Recruitment's commitment to ensure all workers within our operations and supply chains are recruited, ethically and have a fair work free from exploitation.
- The commitment to develop and adopt a proactive approach to prevent, respond and remediate labour exploitation risks.
- The protections that apply to all workers throughout their application, recruitment, subsequent employment and after it is finalised.
- Frontline Recruitment requires the same commitment of all of business partners, including:
 - Suppliers and Service Providers
 - Labour Providers or Recruiters (Second tier support and or Master Vendor)
 - Recruitment Intermediaries (and sub-agents)
 - Labour User/Employer clients

2. RESPONSIBILITY

Tony Wilmot and Elliot Kidd is responsible for overseeing the implementation, operation, monitoring, evaluation and ongoing improvement of this Policy as part of our strategic management system approach.

3. POLICY COMMITMENTS

- 3.1 Frontline Recruitment is committed to embedding the fair work and responsible recruitment standards listed below into our operations and supply chains.
- 3.1.1 Proactive steps are taken to mitigate the risk of forced labour, and where it is identified there is appropriate response and remediation. Workers have freedom of movement throughout recruitment and work.
 - 3.1.2 No child labour is used, migrant workers under 18 are not recruited and where child labour is identified there is appropriate response and remediation.
 - 3.1.3 No recruitment fees or related costs are paid by workers, and where evidence of fee-charging is identified, there is appropriate remediation, including worker reimbursement.
 - 3.1.4 Job information is clear, accurate and fully understood by workers, and the employment relationship is formal, lawful and appropriate to the working arrangements and true employment status of the worker.
 - 3.1.5 There are systems in place to ensure all workers have been properly recruited and onboarded and have legal eligibility to work.
 - 3.1.6 Pay and benefits are fair and received on time by workers in accordance with legal and contractual rights.
 - 3.1.7 Regular work is offered, working hours accord with legal and responsible recruitment standards, and workers have adequate rest periods.
 - 3.1.8 Workers are protected from injury and illness arising from work, including adequate protections against climate hazards.
 - 3.1.9 Accommodation and/or transport are safe, hygienic, meet workers' basic needs and accord with relevant national legislation and guidance.
 - 3.1.10 Workers' right to freedom of association and collective bargaining are respected.
 - 3.1.11 All workers receive fair and equal opportunity and treatment free from discrimination; diversity and inclusion are promoted and no harsh or inhumane treatment is allowed.
 - 3.1.12 Termination of workers' contracts is managed responsibly with workers receiving all outstanding pay and benefits to which they are entitled, and freedom to change employment is respected.
 - 3.1.13 All workers can access effective grievance mechanisms and response and remedy procedures without fear of repercussions. A worker-centred approach is taken to support high levels of worker satisfaction and engagement.
 - 3.1.14 The business is operated ethically and professionally, with responsible and collaborative purchasing practices ensuring all workers, including within the supply chain, receive all their entitlements.
- 3.2 Frontline Recruitment is committed to embedding the fair work and responsible recruitment standards listed below through the following six-step framework¹:
- 3.2.1 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.
 - 3.2.2 Assess risks in meeting the responsible recruitment standards in our operations and supply chains.
 - 3.2.3 Take action to deal with any identified risks including necessary internal and external training and ensure effective grievance mechanisms are in place.
 - 3.2.4 Provide remedy for any issues identified through a people-centred approach.
 - 3.2.5 Monitor the progress we make with necessary key performance indicators and commit to continuous improvement.
 - 3.2.6 Communicate openly and transparently about the progress we make and any challenges we face.

¹ Based on the United Nations Guiding Principles on Business and Human Rights.