

Blends Labour Agency Standards Policy

(ILO & Sedex / SMETA Pillar 2 – Labour Standards Compliant)

1. Purpose

The purpose of this policy is to ensure that all labour agencies, recruiters, and employment intermediaries engaged by Blends operate in a manner that upholds workers' rights, ethical recruitment, and fair working conditions in accordance with ILO conventions and Sedex SMETA Pillar 2 – Labour Standards. The requirements in the document form a key element of our responsible sourcing strategy covering both indirect, direct suppliers and services providers into our site. Compliance to the requirements of this policy is a prerequisite to approval.

2. Scope

This policy applies to:

- All labour agencies, recruitment companies, and sub-agents supplying temporary labour.
- All agency-supplied workers, including temporary, contract, permanent, and migrant workers
- All countries and regions where Blends operate

3. Reference Standards

This policy is aligned with:

- ILO Core Conventions
- ILO General Principles and Operational Guidelines for Fair Recruitment
- Sedex Members Ethical Trade Audit (SMETA) – Pillar 2: Labour Standards
- Applicable national labour laws

Where there is a difference between local law and this policy, the higher standard shall apply.

4. Freely Chosen Employment

- Employment must be voluntary and freely chosen.
- Labour agencies must not use forced, bonded, indentured, or trafficked labour.
- Workers must not be required to:
 - Pay deposits
 - Lodge identity documents
 - Accept debt or loans as a condition of employment
- Workers must be free to leave employment after reasonable notice, in line with the law.

(ILO C29, C105 | SMETA Pillar 2 – Freely Chosen Employment)

5. Ethical Recruitment and Fees

- Workers must **not pay recruitment fees or related costs**, directly or indirectly, at any stage of recruitment or employment.
- Prohibited fees include, but are not limited to:
 - Placement or service fees
 - Application or processing fees
 - Medical checks (unless legally required and reimbursed)
 - Travel, visa, or work permit costs
- All recruitment costs must be paid by the employer or labour agency.
- Any worker found to have paid fees must be reimbursed promptly.

(ILO Fair Recruitment Principles | SMETA Pillar 2)

6. Employment Contracts and Transparency

- Workers must receive a written employment contract **before deployment**.
- Contracts must be:
 - In a language the worker understands
 - Signed voluntarily
 - Consistent with actual working conditions
- Contracts must clearly state:
 - Job role and work location
 - Wages and benefits
 - Working hours and overtime
 - Deductions (lawful and transparent)
 - Termination conditions

(SMETA Pillar 2 – Terms of Employment)

7. Wages and Benefits

- Workers must be paid:
 - At least the legal minimum wage, or
 - Industry or collective bargaining rates, where applicable
- Wages must be paid regularly, on time, and in full.
- Wage deductions must be lawful, transparent, and documented.
- Workers must receive all legally required benefits.

(ILO C100 | SMETA Pillar 2 – Wages)

8. Working Hours

- Working hours must comply with:
 - National law
 - ILO standards
- Overtime must be:
 - Voluntary
 - Compensated at the legally required premium
- Workers must receive:
 - At least one day off in seven, unless otherwise permitted by law
 - Adequate rest breaks

(ILO C1, C14 | SMETA Pillar 2 – Working Hours)

9. Freedom of Association and Collective Bargaining

- Workers have the right to form and join trade unions of their choosing.
- Labour agencies must not interfere with or penalise lawful union activities.
- Where the right to unionise is restricted by law, agencies must allow alternative forms of worker representation.

(ILO C87, C98 | SMETA Pillar 2)

10. Non-Discrimination

- Recruitment and employment decisions must not discriminate based on:
 - Gender, race, nationality, religion, age, disability, caste
 - Sexual orientation, political opinion, or union membership
- Equal pay must be provided for work of equal value.

(ILO C100, C111 | SMETA Pillar 2)

11. Child Labour and Young Workers

- Labour agencies must not employ workers below:
 - The legal minimum working age, or
 - 15 years old (whichever is higher)
- Robust age verification processes must be in place.
- Young workers must not perform hazardous or night work.

(ILO C138, C182 | SMETA Pillar 2)

12. Humane Treatment



- Workers must be treated with dignity and respect.
- Physical abuse, harassment, intimidation, threats, or verbal abuse are prohibited.
- Disciplinary practices must not include fines, deductions, or coercion.

(SMETA Pillar 2 – Humane Treatment)

13. Grievance Mechanisms

- Labour agencies must provide accessible and confidential grievance mechanisms.
- Workers must be able to raise concerns without fear of retaliation.
- Complaints must be investigated promptly and fairly.

(SMETA Pillar 2 – Management Systems)

14. Sub-Agent Management

- Sub-agents must not be used without prior written approval.
 - Labour agencies remain fully responsible for the actions and compliance of any approved sub-agents.
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15. Monitoring, Audits, and Records

- We reserve the right to:
 - Conduct audits, including SMETA audits
 - Interview workers
 - Review recruitment and employment records
 - Labour agencies must maintain accurate and complete records.
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16. Non-Compliance and Corrective Action

- Non-compliance may result in:
 - Corrective action plans
 - Suspension of recruitment
 - Termination of the business relationship
 - Serious violations (e.g. forced labour, recruitment fees, child labour) may result in immediate termination.
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17. Communication and Training

- This policy must be communicated to:
 - All agency staff involved in recruitment
 - All workers in a language they understand
 - Relevant personnel must receive regular training on labour standards and ethical recruitment.
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18. Policy Review

This policy will be reviewed periodically to ensure continued alignment with ILO standards and Sedex/SMETA Pillar 2 requirements.



Michael Rowark
Managing Director
Blends Ltd

A handwritten signature in black ink, appearing to read 'Michael Rowark', written in a cursive style.