TEAM PRINTERS SDN BHD (TPSB)

FOREIGN WORKERS RECRUITMENT GUIDELINE & PROCEDURE

1. INTRODUCTION

Team Printers Sdn Bhd under Human Rights and Workplace specifically states that we will "follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries". This document, "Foreign Workers Recruitment Guideline and Procedure" will provide and serve as a framework to ensure our adherence to this commitment.

2. OBJECTIVE

This guideline and procedure will provide clarity and transparency on the processes of hiring or legalising foreign workers as well as to ensure that all our recruitment activities.

3. SCOPE

This recruitment guideline guideline and procedure of recruiting foreign workers includes foreign workers requisition, recruitment or legalisation processes, and roles of Human Resource Department (HRD).

This "Foreign Workers Recruitment Guideline & Procedure", specifically pertaining to our "No Recruitment Fee" policy Q4 2020.

4. FOREIGN WORKERS REQUISITION

In general, each Head of Department (HOD) will send their requisition for the number of foreign workers required to HRD.

4.1 Recruitment sources of countries

Team Printers will generally recruit foreign workers from various countries, for example:

i.) Nepal
ii.) Myanmar
iii.) Bangaladesh

4.2 "No Recruitment Fee" Policy

Team Printers practices a "No Recruitment Fee" policy in recruiting its foreign workers. Team Printers covers the official cost of recruiting foreign workers,.Any other costs not listed therein shall not be charged to the workers, and should they be, will be handled according to **6.3**.

5. FOREIGN WORKERS EMPLOYMENT STAGES

The recruitment of foreign workers consists of three main stages namely (i) pre-employment, (ii) employment and (iii) post-employment.

6. PRE-EMPLOYMENT

6.1 Confirmation to hire new workers

If needs arise, respective HOD is to notify HRD to request for foreign workers. HRD is then required to acknowledge the request and seek approval from Managing Director. Once approval is given, HRD will proceed with the requisition of foreign workers through agencies.

6.2 Recruitment agencies

Selection of recruitment agencies is based on many factors including, but not limited to, reputation, cost and reliability. The recruitment agency shall be legally registered in its home country and has a long-standing reputation. The agency should also sign a letter of commitment to adhere to our policies before we engage their services.

The workers will be briefed thoroughly on job functions and contract details as part of the employment process before the workers are asked to sign the working contract. Team Printers has also made available all the employment contracts in the worker's native language.

The recruitment agency is expected to compile a list of the workers' biodata, along with formal letter of undertaking for successful applicants to be submitted to HRD.

6.3 Policy enforcement

According to Team Printers "No Recruitment Fee" policy stated in this document (see Section 4.2), where recruited foreign workers are concerned, no recruitment fees, including any fees incurred to them at any stage of the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries will be charged to them.

Recruitment agencies are responsible for monitoring their possible sub-agencies to make sure that they follow these guidelines and do not charge any recruitment related fees from the workers. If such fees are found to be charged to the workers, Team Printers will require the recruitment agency to repay the workers. If such an action has not been undertaken by the recruitment agency, Team Printers will suspend any relationship with the agency until the matter is rectified. Team Printers will terminate all contract or partnership with any recruitment agency that is found to be non-compliant with the policies after the necessary investigations and warnings.

6.4 HRD roles

The recruitment agency will send necessary supporting documents (letter of undertaking, declaration, videos of their briefing, etc.) to HRD to ensure that proper recruitment processes are being followed through and monitored.

After all the necessary payments and documentations are completed, the Immigration Department will issue a Visa with Reference (VDR). HRD will then notify recruitment agency a list of approved workers and email the VDR to them. The agency will then inform HRD through email with a list of confirmed workers to arrive in Malaysia, along with their flight details. The workers will be notified which Team Printers they will be placed in, they are required to sign a contract with the agency before coming to Malaysia.

7. EMPLOYMENT

7.1 Arrival of workers

HRD has to pick up the workers from the airport within 6 hours of their arrival according to immigration law. The travel cost of the workers from their country of origin to Malaysia will be borne by Team Printers.

The workers are to be sent to their respective HOD and have their documentation, registration, post-arrival interview completed. Post-arrival interview is important to ensure that no abuse of human rights that violates our SPOP is taking place. It is also important to ensure that our appointed recruitment agencies are complying with our policies, particularly the "No Recruitment Fee" policy.

7.2 Orientation and induction training

The orientation and induction training will be conducted by the HR Manager or HR Executive, as well as safety officer in charge of Safety, Health, and Sustainability with assistance of an interpreter.

The program includes explanations on employment contract, wages, medical leave, annual leave, voluntary overtime, payslips details, hostel and company rules and regulations, safety training, immigration law, job functions in factory.

The program will also cover introduction of company's various policies related to sexual harassment, grievance procedures, freedom of association, non-discrimination and handling of passports. Interpreters will also be trained on how to conduct training to the workers. The training material is currently available in English and Bahasa Malaysia. The translation of the training material into other languages such as Bangladeshi , Nepali and Myanmar is ongoing.

During the Worker Committee meeting, there will also be short briefing/training to the workers given by these trained interpreters from time to time to ensure that information regarding their rights at the workplace or any policies updated are being made clear to them.

The workers will also be taken to their accommodations, workplaces, and basic facilities such as clinic and sundry shop around the estates.

7.3 Health screening

HRD is required to register foreign workers at FOMEMA and have the workers to do their health screening within one week of arrival or legalization in Malaysia at panel clinics with all costs borne by Team Printers, except if they failed their health screening. HRD is also required to notify the Labour Department for hiring of new foreign workers.

For those workers who have failed their health screening, please refer to **8.1.**

7.4 Provision of basic items

HRD is responsible to provide new foreign workers with basic items such as mattress, pillow, water container, wellington shoes and personal protective equipment (PPE).

7.5 Passport handling

In accordance with the Group's passport safekeeping guidelines, the workers are free to decide how and where they want their passports to be kept. They can either:

a) Keep their passports themselves;
b) Have their passports kept in a centralized passport lockers in the factory provided by the management, to which workers have 24-hour access

7.6 Renewal of passport, work permit or visa

While the workers are free to decide how and where they want their passports to be kept, the employer will request for the passport from the workers at least 90 days prior to the expiration of their passport, work permit or visa for renewal. The workers will acknowledge this by signing a document that states their passport is taken merely for the renewal of their passport, work permit, or visa. Any request from the worker who may have an emergency or personal reason to travel out of the country after submission of their passport will be considered by the management on a case-by-case basis.

7.7 Opening of savings account

Where such banking facilities are available, respective Team Printers management is required to open saving accounts for the workers within 7 days of confirmation of employment.

7.8 Filing

RespectiveHRD is required to file biodata of workers.

7.9 Grievance mechanism

The workers have the right to freedom of association and are provided with a channel to voice out their grievances. The management is committed to an open and transparent approach to resolve outstanding grievances with the involvement of affected stakeholders. Any worker can submit their grievances via the Workers Committee or remain anonymous via various channels provided (email, website, whatapp) if they choose to do so .The management will then plan the investigation and address any grievances submitted. The workers will not have any form of retaliation action taken against them for doing so. All grievances submitted will remain confidential.

7.10 "One-off" ex-gratia payment

To further reflect our strong commitment towards the upholding of human rights at workplace, a one-off ex-gratia payment will be given to our workers who have worked for more than 2 or 3 years, depending on their contracts, and recruited before Q4 2020. These workers may not have benefited from our newly-introduced "No Recruitment Fee Policy". Therefore, the one-off ex-gratia payment is given in goodwill to our workers to ensure that they are also treated fairly in accordance with the Company policies. The one-off payment is also given as a form of recognition for their long service in the Company.

8. POST-EMPLOYMENT

Upon completion of their contract period, the workers are free to choose whether to renew their contract or be repatriated back to their home country.

8.1 Unfit workers

For any newly-recruited worker, who has failed their FOMEMA health screening within the 3-month guaranteed period, HRD has to make necessary arrangement to repatriate the worker concerned and have all cost borne by the recruitment agency.

However, for foreign workers who have been working with the company but yet to complete their contract period, and found to be physically or medically unfit, disabled, coma or paralyzed due to exposure to hazardous, contagious disease or substance, involvement in accident while in employment, based on the doctor's medical report and recommendation for repatriation, the repatriation cost shall be borne by the company.

The company will not bear the repatriation cost for workers who are found to be physically or mentally unfit due to self-negligence arising from such cases of self-inflicted injury or suicidal behavior, drug abuse, deliberate exposure to unsafe practices, refusal to use PPEs or to comply with safety standards, or infected with sexual transmitted disease, etc., which are not treatable and may impact work performance.

8.2 Contract renewal

The contract period for foreign workers vary according to countries. The workers are free to apply for contract extension up to maximum of 10 years according to Malaysian law. The decision to extend their contract is subject to recommendation by respective HOD.

8.3 Renewal of work permit

The respective HOD will send a list of names of foreign workers whose work permit is expiring in 3 months' time to HRD. HRD will also be notified by respective HOD a list of names of foreign workers who choose to renew their contract or be repatriated. For those workers who renew their work permit, the HRD will arrange for their health screening.

HRD is responsible to handle work permit renewal and the cost will be borne by the company.

8.4 Early termination

In the case of a worker who decides to leave before contract ends, the Team Printers manager will first seek to understand the reason(s) behind the worker's resignation. The first priority of the Team Printers is always to resolve any problem the worker may face and to ensure the worker continues to work in the Team Printers. However, if the worker insists on his resignation, there will be no penalty imposed but any repatriation cost will be borne by the worker.

Additionally, the worker shall not be required to pay any fees if the worker had to resign without fulfilling the full notice period due to documented harassment, abuse or threat to safety.

This Guideline will be effective on the date of publication.

November 2020