

1. Introduction and Scope

PINOY 385 d.o.o., as an agency registered in the records of legal and natural persons performing employment-related activities with the ministry responsible for labor, establishes a system of written policies for employment mediation and temporary employment (staffing) of workers, aligned with:

- SMETA 4-pillar requirements
- UN Guiding Principles on Business and Human Rights (UNGPs)
- International Labor Conventions (ILO Core Conventions)
- EU legislation and national laws of the Republic of Croatia

These policies apply to:

- all employees of PINOY 385 d.o.o.,
- candidates and workers recruited by the company,
- all subcontractors and recruitment partners in the employment chain,
- clients and users of our services,
- all countries of origin and destination of workers.

The management of PINOY 385 is fully committed to implementing and continuously improving these policies.

2. Human Rights and Labor Standards Policy

PINOY 385 commits to:

- respecting internationally recognized human rights,
- conducting Human Rights Due Diligence (HRDD) in accordance with the UNGP model,
- protecting workers' rights throughout all stages of recruitment and employment,
- identifying, preventing, and mitigating risks of human rights violations,
- ensuring access to grievance mechanisms without fear of retaliation.

Fundamental commitments:

- prohibition of forced labor and human trafficking,
- prohibition of charging any recruitment fees to workers,
- respect for workers' rights, including working hours, wages, and working conditions,
- protection of migrant workers through transparent and fair communication,
- safeguarding confidentiality of personal data in accordance with GDPR.

3. Ethical Recruitment Policy

PINOY 385:

- uses only lawful, ethical, and transparent recruitment methods,
- conducts formal due diligence on all recruiters and agents,
- cooperates exclusively with licensed and registered recruitment agencies,

- provides workers with information on working conditions prior to contract signing,
- ensures that contracts are written in clear and understandable language,
- provides contracts in a language the worker understands,
- allows workers to ask questions before signing the contract,
- provides workers with their own signed copy of the employment contract.

Prohibited practices:

- withholding passports or personal documents,
- recruiting workers to replace striking workers with the staffing beneficiary,
- using misleading or non-transparent information in recruitment.

4. Modern Slavery and Forced Labor Policy

PINOY 385 has zero tolerance for any form of modern slavery.

Prohibited:

- forced labor,
- debt bondage,
- recruitment through threats or coercion,
- retention of workers' personal documents,
- charging recruitment-related fees to workers,
- forced overtime,
- involuntary prison labor.

The organization commits to:

- conducting detailed modern slavery risk assessments,
- regularly monitoring recruitment practices and working conditions,
- ensuring that workers are informed of their rights,
- implementing remediation in case of violations.

5. Child Labor and Young Workers Policy

PINOY 385 commits to:

- not employing or recruiting any person under the age of 18,
- carrying out strict age verification before employment,
- acting immediately if an underage worker is identified,
- implementing a Child Labor Remediation Plan ensuring protection and return to education.

The policy includes:

- prohibition of child labor (<15 years),
- definition of young workers (15–17 years),
- prohibition of the worst forms of child labor.

6. Equal Opportunity and Non-Discrimination Policy

PINOY 385 ensures:

- equal treatment of all candidates and workers,
- prohibition of discrimination based on race, ethnicity, sex, gender, age, religion, sexual orientation, disability, nationality, or any other protected status,
- objective and transparent selection criteria,
- training of staff on equal treatment and bias awareness,
- monitoring of recruitment practices to prevent discrimination.

Prohibited:

- asking discriminatory questions,
- rejecting candidates for reasons not related to qualifications or job requirements.

7. Freedom of Association and Collective Bargaining Policy

PINOY 385 guarantees:

- workers' right to freely associate,
- the right to join a trade union,
- the right to participate in collective bargaining,
- prohibition of retaliation for trade union activity.

The organization confirms:

- it does not discriminate against workers or candidates for union membership,
- employment contracts do not prohibit or discourage union participation,
- it does not recruit workers to replace striking workers.

8. Grievance Mechanism Policy

Workers are ensured:

- multiple channels for submitting grievances (email, phone, online form, physical box, confidential contact person),
- access to information on state and industry grievance mechanisms,
- the right to anonymity,
- protection from retaliation.

The organization ensures:

- a documented grievance-handling procedure,
- a centralized grievance record system,
- timely resolution of grievances,
- possibility for feedback on the effectiveness of the system.

9. Business Ethics and Anti-Corruption Policy

PINOY 385 prohibits:

- bribery and corruption in any form,
- conflicts of interest,
- giving or receiving inappropriate gifts or hospitality,
- unethical business conduct,
- money laundering.

The organization ensures:

- compliance with Croatian, EU, and international legislation,
- code of conduct for business partners,
- a confidential whistleblowing system,
- an investigation process for allegations of corruption,
- training for employees in higher-risk positions.

10. Privacy and Data Protection Policy

In accordance with GDPR, PINOY 385:

- protects personal data of candidates, workers, clients, and partners,
- collects only data necessary for legitimate purposes,
- processes data lawfully, fairly, and transparently,
- ensures appropriate technical and organizational security measures.

11. Commitment to Continuous Improvement

The management of PINOY 385 commits to:

- regularly reviewing these policies,
- updating them in line with legal changes and SMETA requirements,
- conducting internal audits and evaluations,
- providing necessary resources, training, and oversight.

12. Management Responsibility

The management of PINOY 385 is responsible for the implementation, oversight, accessibility, and communication of all policies within the organization.

In Zagreb, 01.09. 2025.

Stjepan Jagodin, director