

## 1. Purpose

This policy outlines OPHARDT Hygiene's commitment to ensuring the fair, legal, and ethical treatment of migrant workers in accordance with international law, European Union (EU) law, and local laws. It establishes clear principles to uphold the rights of all employees, regardless of their country of origin, and to foster an inclusive, compliant workplace.

## 2. Definition

In this document, we define a migrant worker as a person who is to be engaged, is engaged, or has been engaged in a remunerated activity in a State of which they are not a national.

## 3. Compliance

OPHARDT Hygiene adheres strictly to EU and Irish laws, including the Free Movement Directive (2004/38/EC), the European Convention on Human Rights, and local legislation such as the Irish Immigration Act 2009 and the Nationality and Transfrontier Families Act 2005. All practices align with the EU Agency for Fundamental Rights (FRA) guidelines and the Irish Workplace Relations Act 2015.

## 3. Commitments

At OPHARDT Hygiene, we are committed to:

- **Equal Treatment:** Migrant workers receive the same rights, protections, and working conditions as local employees, including equal pay, access to benefits, and opportunities for career development.
- **No Recruitment Fees:** Workers are never required to pay for employment. All recruitment costs are borne by the employer.
- **Freedom of Movement:** We do not retain passports, identity documents, or restrict workers' ability to leave employment. Workers are free to change jobs or return to their home country.
- **Transparent Contracts:** All workers receive clear, understandable employment terms in their preferred language prior to starting work, including details on pay, hours, and termination conditions.
- **Fair Wages & Conditions:** All employees are paid in accordance with applicable laws, including the Irish Minimum Wage, and industry standards. Working conditions meet or exceed legal requirements.

- **Right to Work Compliance:** We conduct appropriate checks (e.g., PPS numbers, work permits, or EU residence permits) to ensure all employment is legal and documented.

OPHARDT Hygiene is dedicated to respecting the dignity, rights, and contributions of all workers. We reject exploitation, discrimination, and unlawful practices. By adhering to this policy, we uphold our responsibility to create a workplace that is just, inclusive, and compliant with international standards.

#### 4. Monitoring & Review

This policy will be reviewed regularly to ensure alignment with evolving regulations. All employees, including migrant workers, will be informed of their rights and the company's commitment to compliance.

#### 7. Approval

This policy is approved by the CEO of OPHARDT Hygiene and is effective as of March 25, 2026.

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A handwritten signature in black ink, appearing to read "K. Friesen", is enclosed in a thin black rectangular box.

**Ken Friesen**  
**CEO**  
**OPHARDT Hygiene**  
March 24, 2026