



WORKER RECRUITMENT

In this section: 

Victoria's Secret & Co. recognizes that migrant workers are most at risk of human trafficking and forced labor. To protect the rights of migrant workers, we have implemented a strict policy to closely monitor any production location hiring migrant workers. The policy includes an executive approval process and is contingent upon positive results found during a specialized audit developed in accordance with the [International Labour Organization's handbook on Combating Forced Labour](#).

We are committed to eliminating the practice of migrant workers paying recruitment fees to secure their employment. Victoria's Secret & Co. follows the Dhaka Principles for Migration with Dignity to enhance respect for the rights of migrant workers. If a factory must use a recruitment agency, they must disclose the name of the agency to our auditors. All the relevant rights listed below must be given to all workers recruited through the agency:

No worker should pay for their job or right to work, and no recruitment fees or related costs should be charged to, or otherwise borne by, workers. The supplier must also cover the costs of the migrant workers' return home.

Workers must retain control of their personal and travel documents such as passports and employment contracts.

All workers must have freedom of movement.

Recruitment should take place in a way that respects and protects human rights.

Workers must be hired through ethically compliant recruitment agencies and must have a formal policy and due-diligence process in place for vetting recruitment agencies they use.

The terms and conditions of employment should be through written contracts and should be clear, transparent and in a language that the worker can understand.

Workers should have access to grievance mechanisms.

Workers should have access to information regarding their rights.

Workers should have healthy and safe living and working conditions.

In 2019, IPS coordinated unannounced risk assessments for factories that employ foreign migrant workers. Workers in all facilities were in possession of their identity documents, had freedom of movement and did not pay for their employment, consistent with Victoria's Secret & Co. Employer Pays Principle. Workers were interviewed to ensure they accepted employment freely, were not indebted to the factory, agent or any person and that the employment terms they accepted were being carried out by the factory.

In 2020, due to COVID and travel restrictions, we were not able to conduct physical risk assessments for all factories that employ foreign migrant workers. We did hold virtual discussions with the factories to ensure the safety and welfare of all workers during the pandemic. We were able to conduct one risk assessment for a factory where we have significant capacity. The factory was found to be compliant with our standards, and all workers were in possession of their identity documents, had freedom of movement and did not pay for their employment, consistent with Victoria's Secret & Co. Employer Pays Principle.

In 2021, IPS coordinated unannounced risk assessments for factories that employ foreign migrant workers. Workers in all

facilities were in possession of their identity documents, had freedom of movement and did not pay for their employment, consistent with Victoria's Secret & Co. Employer Pays Principle. Workers were interviewed to ensure they accepted employment freely, were not indebted to the factory, agent or any person and that the employment terms they accepted were being carried out by the factory.

Consistent with Victoria's Secret & Co. detailed risk analysis of new factories, we will only engage with factories that are fully meeting our compliance standards and policies or are willing to adhere to our standards prior to an order being placed.

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