



# EPP Continuous Improvement Action Plan

COMPANY NAME

PREPARED BY

DATE CREATED

## WHEN THIS FORM IS USED

This Action Plan is required to earn the **Ethical Recruitment Star** when you directly recruit and hire the majority of your workforce, rather than engaging Farm Labor Contractors (FLCs).

## HOW THIS FORM IS USED

You earn the star by completing this form and uploading it to [Grower LAB](#). Your responses remain private to your organization. Suppliers can see whether you have earned this star; some may ask about your continuous improvement plans and accomplishments. If you haven't earned this star, you may be asked why. ECIP administrators may scan the form for completeness and credible engagement before awarding the star.

*“ No worker should pay for a job; employers shall bear the costs of recruitment and placement. ”*

ETHICAL CHARTER ON RESPONSIBLE LABOR PRACTICES · ETHICAL RECRUITMENT

This plan focuses on the continuous improvement of your **Employer Pays Principle (EPP) management system** — the policies, cost documentation, and verification practices that reduce the risk that your workers have borne illegal or unethical fees to any business, government, or person in order to work at your operation.

## PART 1 START WITH YOUR STRENGTHS — DETERMINE

ECIP's Appreciative Inquiry approach builds your plan from your existing strengths: *"the positive core."*

### THE GOAL

A credible self-assessment of **"We are Setting an Example for our Peers"** in Grower LAB for this management system:

*"The Employer Pays Principle has been adopted and integrated in the recruitment and hiring process; a detailed, forward-facing policy is in place, employees are not charged recruitment fees in accordance with this policy, and employer-paid costs vs. employee-paid costs are clearly documented."*

### What are we already doing well?

*e.g., we pay visa and consular fees ourselves; we ask workers how they found out about the job, to screen for recruitment fees; our contracts are in Spanish and signed before deployment; our food-safety documentation discipline could be applied to recruitment cost ledgers; workers return year after year*

### What does good look like?

*e.g., every worker arrives debt-free; a leadership-signed EPP policy is communicated at interview and contracting; the cost ledger shows the employer pays everything; Day-1 conversations confirm no one paid to get their job; if a fee ever surfaces, we repay it in full; we have calculated the extra costs of recruiting ethically and communicated them to our customers*

## PART 2 THE ACTION PLAN — DO

Strong EPP action plans draw from four pillars: **(A)** an executive-signed written EPP policy; **(B)** documented cost mapping; **(C)** worker verification; **(D)** reimbursement calculations and distributions.

Six recommended practices appear below. **Check the box where a practice is a Continuous Improvement Priority for your business**, assign an owner, and set a target date. Then add steps of your own.

| PRIORITY                 | RECOMMENDED ACTION STEP                                                                                                                                                                                            | WHO IS RESPONSIBLE?                         | TARGET DATE | RESOURCES NEEDED                                                                                                                                      |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | Map our hiring journey: trace each step a worker takes from first contact in their home community to Day 1 on the farm, and identify every point where a fee could be charged.                                     | <i>e.g., HR Director</i><br>_____           |             | <a href="#">Ten Ways to Improve Recruitment of Guest Workers</a> ; interviews with returning workers                                                  |
| <input type="checkbox"/> | Draft a written EPP policy prohibiting any recruitment or placement fees to workers and committing to reimburse workers in full for any fees they are found to have paid, signed at the ownership/executive level. | <i>e.g., General Manager</i><br>_____       |             | <a href="#">Stronger Together “Recruitment Fees Policy Template for the US”</a> ; outside the US, the <a href="#">ILO Fair Recruitment Guidelines</a> |
| <input type="checkbox"/> | Build a recruitment cost ledger documenting employer-paid costs (visas, consular fees, in-transit transport/food/lodging, medical tests, orientation) vs. illegal costs workers must never pay.                    | <i>e.g., Payroll / Accounting</i><br>_____  |             | <a href="#">EPP cost table (Appendix A)</a> ; existing H-2A expense records; <a href="#">Verité Recruitment Cost Calculator</a>                       |
| <input type="checkbox"/> | Add a “Did you pay anyone to get this job?” question set to Day-1 onboarding, with a confidential channel for workers to report fees.                                                                              | <i>e.g., HR + Crew Supervisors</i><br>_____ |             | <a href="#">Example EPP onboarding questions (Appendix C)</a> ; translated scripts; reimbursement protocol                                            |
| <input type="checkbox"/> | Adopt a written reimbursement commitment: if any fee is discovered, repay the full amount promptly and directly to the worker, regardless of who collected the fee, and document the repayment in the cost ledger. | <i>e.g., Owner / GM + HR</i><br>_____       |             | <a href="#">Impactt Repayment Principles &amp; Guidelines</a> ; recruitment cost ledger; <a href="#">Verité RCC</a> to verify amounts owed            |

| PRIORITY                                                                                  | RECOMMENDED ACTION STEP                                                                                                                                                                                                                                                                | WHO IS RESPONSIBLE?                 | TARGET DATE | RESOURCES NEEDED                                                                              |
|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------|-----------------------------------------------------------------------------------------------|
| <input type="checkbox"/>                                                                  | Communicate the true cost of ethical recruitment up the value chain: provide your Suppliers with documentation of reimbursed fees and the additional employer-borne costs identified by the RCC, so they can share it with ECIP Buying Partners in their cost and pricing discussions. | <i>e.g., Owner / Sales</i><br>_____ |             | Recruitment cost ledger; <a href="#">Verité RCC</a> outputs; documentation of reimbursed fees |
| <b>YOUR STEPS</b> <i>Add steps below that make sense for your business and workforce.</i> |                                                                                                                                                                                                                                                                                        |                                     |             |                                                                                               |
| <input type="checkbox"/>                                                                  |                                                                                                                                                                                                                                                                                        |                                     |             |                                                                                               |
| <input type="checkbox"/>                                                                  |                                                                                                                                                                                                                                                                                        |                                     |             |                                                                                               |
| <input type="checkbox"/>                                                                  |                                                                                                                                                                                                                                                                                        |                                     |             |                                                                                               |

## PART 3 SUSTAINING SUCCESS — DELIVER

To ensure this becomes a habit and not just a one-time task:

### How will we know we are making progress?

*e.g., % of new hires interviewed at onboarding who confirm no fees paid; EPP policy communicated in 100% of interviews and contracts; cost ledger reviewed each season; zero unresolved fee reports*

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### What support does the team need to keep this going?

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#### I COMMIT TO UPDATING THIS ACTION PLAN ON

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#### THE EPP MANAGEMENT SYSTEM

*"The Employer Pays Principle has been adopted and integrated in the recruitment and hiring process; a detailed, forward-facing policy is in place, employees are not charged recruitment fees in accordance with this policy, and employer-paid costs vs. employee-paid costs are clearly documented."*

#### I WILL UPDATE MY SELF-ASSESSMENT RESPONSE TO THE EPP MANAGEMENT SYSTEM IN GROWER LAB ONCE WE HAVE ACHIEVED:

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**PART 4** FOR YOUR RECORDS — DEFEND

**PRO TIP**

As the importance and awareness of ethical recruitment grows across the industry, the likelihood of being asked about your practices and your continuous-improvement accomplishments is increasing. A robust documentation package to keep at the ready includes: **(1)** your executive-signed EPP policy; **(2)** financial ledgers recording payment or reimbursement of visa, transit, and other recruitment fees; **(3)** documents recording worker confirmation that no fees were paid, or that full reimbursement was received; and **(4)** an action plan like this one that documents continuous improvement.

|              |             |             |
|--------------|-------------|-------------|
| DATE CREATED | REVIEW DATE | REVIEW DATE |
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| CREATED BY   | REVIEWED BY |             |
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## APPENDIX A WHO PAYS FOR WHAT UNDER THE EPP

| ✓ EMPLOYER-PAID COSTS (EPP RESPONSIBILITY)           | ✗ ILLEGAL OR PROHIBITED WORKER-PAID EXPENSES                 |
|------------------------------------------------------|--------------------------------------------------------------|
| Work visas and associated consular processing fees   | Job placement fees, broker service charges, or finder's fees |
| Destination-country documentation & translation fees | Compounding-interest loans to secure placement               |
| In-transit transportation, food, and lodging         | Mandatory deposits, bonds, or forced savings                 |
| Required pre-employment medical testing              | Unreasonable contract termination penalties                  |
| Onboarding and orientation training                  | Under-the-table fees to sub-agents or recruiters             |

Cost categories align with the [ILO Definition of Recruitment Fees and Related Costs](#).

## APPENDIX B EPP RESOURCE POOL

| RESOURCE                                                                           | USE IT TO                                                                   | LINK                                                                                            |
|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| <b>Stronger Together — Recruitment Fees Policy Template for the US</b>             | Draft your executive-signed EPP policy (Pillar A)                           | <a href="https://stronger2gether.org/policy-template">stronger2gether.org → policy template</a> |
| <b>Verité — Recruitment Cost Calculator (RCC)</b>                                  | Calculate true H-2A recruitment costs and build your cost ledger (Pillar B) | <a href="https://verite.org/calculator">verite.org/calculator</a>                               |
| <b>Stronger Together 360 — Online Tool</b>                                         | Baseline your recruitment due diligence and track progress                  | <a href="https://stronger2gether.org/ST360">stronger2gether.org → ST360</a>                     |
| <b>IHRB — Six Steps to Responsible Recruitment</b>                                 | Step-by-step EPP implementation guide                                       | <a href="https://ihrb.org/SixSteps">ihrb.org → Six Steps (PDF)</a>                              |
| <b>EFI — Ten Ways to Improve Recruitment of Guest Workers</b>                      | Map your hiring journey and identify practical recruitment improvements     | <a href="https://equitablefood.org/TenWays">equitablefood.org → Ten Ways (PDF)</a>              |
| <b>ILO — Fair Recruitment Guidelines &amp; Definition of Recruitment Fees</b>      | Apply globally recognized standards for operations outside the US           | <a href="https://ilo.org/FairRecruitment">ilo.org → Fair Recruitment</a>                        |
| <b>Impactt — Principles &amp; Guidelines for the Repayment of Recruitment Fees</b> | Design your reimbursement protocol and calculate repayments (Pillar D)      | <a href="https://impacttlimited.com/Repayment">impacttlimited.com → Repayment</a>               |

**APPENDIX C**   **EXAMPLE EPP ONBOARDING QUESTIONS**

*Ask these verbally and privately, in the worker’s language, during Day-1 onboarding. The interviewer documents the worker’s response. A “yes” to any fee question activates your reimbursement protocol.*

| ASK EACH NEW WORKER                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| How did you first hear about this job?                                                                                                                        |
| Did you pay money, or give anything of value, to anyone to get this job? This includes recruiters, agents, drivers, or anyone else, at home or along the way. |
| Did you borrow money, or sell anything, to cover the costs of getting this job or traveling here?                                                             |
| Were you told that you would need to pay anything back out of your wages?                                                                                     |
| If you ever have a concern about fees or how you were hired, do you know how to report it confidentially?                                                     |