

Child Labour Policy

1. Purpose

The purpose of this policy is to demonstrate Newfield Fabrications Co Ltd's commitment to preventing child labour in all operations and throughout its supply chain, in compliance with UK labour laws and international human rights standards.

This policy supports the principles of the UK Modern Slavery Act 2015.

2. Scope

This policy applies to all employees, contractors, suppliers, and other business partners engaged with Newfield Fabrications Co Ltd in any capacity within the United Kingdom or overseas.

3. Legal Framework

Newfield Fabrications Co Ltd complies with applicable UK laws, including:

- Children and Young Persons Act 1933
- Education Act 1996
- Working Time Regulations 1998
- Health and Safety (Young Persons) Regulations 1997
- Modern Slavery Act 2015

4. Policy Statement

Newfield Fabrications Co Ltd strictly prohibits the use of child labour in any of its operations or supply chain.

- No person under the minimum school leaving age (usually 16 in the UK) shall be employed.
- Persons aged 16–17 (classified as young workers) may only be employed in accordance with legal restrictions — including limits on working hours, night work, and hazardous activities.
- No young worker shall be employed in work that could jeopardise their health, safety, or moral development.

5. Verification of Age

To ensure compliance:

- All employees must provide official proof of age (passport, birth certificate, or national ID).
- HR must verify and retain documentation as part of the recruitment process.
- Contractors and suppliers must maintain similar verification procedures and provide evidence on request.

6. Suppliers and Contractors

- All suppliers and contractors must agree to and comply with Newfield Fabrications Co Ltd's Child Labour Policy as a condition of business.
- Newfield Fabrications Co Ltd reserves the right to audit suppliers to ensure compliance.
- Any supplier found to be in breach will be required to take immediate corrective action, or their contract may be terminated.

7. Remediation Procedures

If a case of child labour is identified within the company's operations or supply chain:

- The child shall be **immediately removed** from all work-related duties.
- Newfield Fabrications Co Ltd will work with relevant authorities, or educational institutions to ensure the child's safe reintegration into education or training.
- Root causes will be analysed and addressed to prevent recurrence.

8. Roles and Responsibilities

- HR Department: Implements and monitors compliance with this policy.
- Managers and Supervisors: Must ensure no underage individuals are employed and report any suspected breach.
- Suppliers and Contractors: Must enforce this policy within their own operations.

9. Training and Awareness

Newfield Fabrications Co Ltd will provide training/information/guidance for HR and management teams on:

- UK laws on young workers and child labour
- Ethical recruitment practices
- Reporting and escalation procedures

10. Reporting and Whistleblowing

Anyone may report suspected child labour confidentially to the HR Department.

Reports will be investigated promptly and sensitively.

No retaliation will be tolerated against anyone raising a concern in good faith.

11. Policy Review

This policy will be reviewed **annually** or whenever relevant legislation or company operations change.

HR Department
01.10.25