

Forced Labour and Human Trafficking Policy

1. Purpose

The purpose of this policy is to confirm Newfield Fabrications Co Ltd's commitment to preventing all forms of forced labour, servitude, and human trafficking within its operations and supply chains. We are dedicated to conducting business ethically and with integrity, ensuring that all employment relationships are freely chosen and compliant with UK law and international human rights standards.

2. Scope

This policy applies to:

- All employees, agency staff, contractors, and subcontractors;
- All suppliers, service providers, and business partners engaged by Newfield Fabrications Co Ltd;
- All operations and supply chain activities conducted in the United Kingdom or overseas.

3. Legal and Ethical Framework

This policy is based on and compliant with:

- Modern Slavery Act 2015
- Human Rights Act 1998
- UK Employment Law, including the Employment Rights Act 1996

4. Policy Statement

Newfield Fabrications Co Ltd has zero tolerance for forced labour, bonded labour, involuntary prison labour, slavery, or human trafficking in any part of its business or supply chain.

We ensure that:

- All work is undertaken voluntarily.
- No worker is forced, coerced, or deceived into employment.
- Workers are free to leave employment with reasonable notice.
- No recruitment fees or related costs are charged to workers (in line with the Recruitment Fee Policy).
- No worker's passport, ID, or personal documents are retained to restrict their movement or freedom.

5. Definitions

Forced Labour: All work or service exacted from any person under the menace of penalty and for which the person has not offered themselves voluntarily.

Human Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons through threat, coercion, or deception for the purpose of exploitation.

6. Recruitment and Employment Practices

To prevent forced labour or trafficking, Newfield Fabrications Co Ltd:

- Conducts due diligence on all labour providers and recruitment agencies.
- Only uses licensed and reputable agencies.
- Requires written confirmation from agencies that no worker has paid recruitment fees or been coerced into employment.
- Provides workers with clear written contracts in a language they understand.
- Ensures that wages are paid directly to workers, in full, and in accordance with UK wage laws.

7. Supply Chain Responsibility

Newfield Fabrications Co Ltd expects all suppliers and contractors to uphold the same standards. Suppliers must:

- Comply with the Modern Slavery Act 2015 and this policy;
- Allow audits and inspections to verify compliance;
- Implement systems to detect, prevent, and address forced labour risks;
- Take corrective action if any indicators of modern slavery are identified.

Failure to comply may result in termination of contract and potential reporting to relevant authorities.

8. Monitoring and Auditing

Newfield Fabrications Co Ltd will:

- Conduct risk assessments to identify areas of potential vulnerability to forced labour/trafficking;
- Carry out internal and supplier audits;
- Review findings and require remedial action where necessary;

9. Training and Awareness

- All managers, HR personnel, and procurement staff receive training/instruction/guidance on recognising signs of forced labour and human trafficking.
- Suppliers and labour providers are encouraged or required to attend training sessions where appropriate.
- Awareness materials will be provided to all staff to promote understanding of ethical employment practices.

10. Reporting and Whistleblowing

Anyone who suspects or becomes aware of any form of forced labour or human trafficking must report it immediately through:

- The company's Whistleblowing Policy or Grievance Procedure;
- Direct contact with the HR Department;

All reports will be handled confidentially and investigated thoroughly.

No employee or worker will face retaliation for raising a concern in good faith.

11. Continuous Improvement

Newfield Fabrications Co Ltd is committed to continuously strengthening its controls and practices to prevent forced labour and human trafficking, including:

- Regular policy reviews;
- Engagement with stakeholders to improve supply chain transparency.

12. Policy Review

This policy will be reviewed **annually** or whenever changes occur in legislation, business operations, or risk profile.

HR Department
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