

Recruitment Fee Policy

1. Purpose

The purpose of this policy is to ensure that all workers engaged by Newfield Fabrications Co Ltd either directly or through third-party recruiters, labour providers, or contractors are not charged any recruitment-related fees or costs as a condition of employment.

This policy supports fair and ethical recruitment practices and complies with the Modern Slavery Act 2015, preventing exploitation and debt bondage within the company's operations and supply chain.

2. Scope

This policy applies to:

- All direct employees of Newfield Fabrications Co Ltd;
- All temporary, contract, or agency workers;
- All third-party recruiters, employment agencies, and labour providers supplying workers to the company, whether based in the UK or abroad.

3. Legal and Ethical Framework

This policy is based on:

- Employment Agencies Act 1973
- Conduct of Employment Agencies and Employment Businesses Regulations 2003
- Modern Slavery Act 2015
- GLAA (Gangmasters and Labour Abuse Authority) Licensing Standards

4. Policy Statement

Newfield Fabrications Co Ltd has a zero-tolerance policy on the charging of recruitment fees or related costs to workers.

- No worker shall pay, directly or indirectly, any fees or expenses related to securing or retaining employment with Newfield Fabrications Co Ltd.
- The company will only work with recruiters, agencies, or labour providers that comply fully with this principle.

5. Definition of Recruitment Fees

Recruitment fees include (but are not limited to):

- Payments for job placement, registration, or processing applications.
- Costs for medical tests, background checks, or skills testing (unless legally required and paid by the employer).
- Travel or relocation expenses imposed as a condition of hiring.
- Fees for work permits, visas, or legal documentation.
- Deductions from wages for recruitment-related costs.
- Payments to intermediaries, brokers, or sub-agents.

All such costs must be borne by Newfield Fabrications Co Ltd or its approved recruitment partners, never by the worker.

6. Responsibilities

- HR Department: Ensures all employment offers and contracts comply with this policy and verifies that no recruitment fees are charged.
- Procurement/Compliance Team: Conducts due diligence and audits of all labour providers and recruiters.
- Recruiters and Labour Providers: Must declare compliance with this policy and provide transparent documentation of recruitment processes.
- Managers and Supervisors: Must only engage approved recruiters and report any suspected breaches.

7. Monitoring and Compliance

Newfield Fabrications Co Ltd will:

- Conduct regular **audits** of recruitment agencies and labour providers.
- Require written confirmation that workers have not been charged any recruitment-related fees.
- Investigate any reports of fees being charged and take immediate **corrective action**, including reimbursement and termination of contracts if necessary.

8. Remediation Measures

If it is found that a worker has paid recruitment fees:

- Newfield Fabrications Co Ltd will ensure **full reimbursement** of those fees.
- The company will investigate the circumstances and take disciplinary or contractual action against responsible parties.
- Preventive measures will be implemented to avoid recurrence.

9. Reporting Mechanism

Workers, contractors, or other stakeholders may report any suspected violation of this policy through:

- The company's Whistleblowing or Grievance channels;
- Directly to the HR Department.

All reports will be handled confidentially, and no retaliation will be taken against anyone who raises a concern in good faith.

10. Training and Awareness

All staff involved in recruitment, HR, procurement, or supplier management will receive training/instruction/guidance on:

- Ethical recruitment practices;
- Recognising recruitment fee violations;
- Reporting and remediation procedures.

Recruitment agencies and labour providers must also undergo compliance and ethics training where required.

11. Review and Updates

This policy will be reviewed annually or whenever relevant legal, operational, or regulatory changes occur.

12. Declaration

All recruitment partners, labour providers, and employment agencies engaged by Newfield Fabrications Co Ltd must sign a declaration confirming:

- They do not charge workers recruitment fees;
- They comply with all UK labour laws and ethical recruitment standards;
- They will cooperate fully with audits and investigations.

HR Department
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