


MANAGEMENT SYSTEM		
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Doc No	MODERN SLAVERY AND ETHICAL TRADING AND EMPLOYMENT POLICY	

### Overview

Neway is only as strong as the communities in which it trades, and it encourages it's Supply Chain to adopt the same principle.

Therefore, Neway strives to be a fair partner by ensuring good working conditions for everyone in our employment and within our Supply Chain.

Neway continues to set out this policy document on the principles of the Ethical Trading Initiative (ETI) "Base Code" and the Modern Slavery Act 2015. Already to date the steps we have taken to prevent modern slavery from occurring in our business and Supply Chains, is as follows:

### Our Supply Chain

Our Supply Chain covers a broad range of goods and services associated with the operation of our business including: third party labour, fixed and mobile plant and equipment, a wide range of engineering and operational goods and services as well as a wide range of Engineering projects.

### Our Policy on Slavery and Human Trafficking

Neway shall, so far as is reasonably practicable, ensure that no person holds another person in slavery or servitude during employment and shall ensure that sub-contractors and related businesses adopt the same principles within this policy. The Modern Slavery Act 2015 is the foundation for this policy and is the legal reference for any enquiries. In 2020 we are reviewing how our processes can be further improved to underpin this assurance.

### Ethical Trading Initiative 'Base Code'

The ETI has developed a code of labour practice – the ETI Base Code. It reflects the international standards most relevant to labour practices.

### The Modern Slavery Act 2015 and The Ethical Trading Initiative Base Code is applied as follows:

#### 1. Employment is freely chosen


1.1 There is no forced, bonded or involuntary prison labour.

#### 2. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, have the right to join a trade union of their own choosing and to bargain collectively.

2.2 Worker representatives are not discriminated against and are provided with a reasonable amount of time and facilities to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and collective bargaining is restricted under law, we facilitate, and do not hinder, the development of parallel means for independent and free association and bargaining.

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**3. Working conditions are safe and hygienic**

3.1 A safe and hygienic working environment is provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring during work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive full induction and regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Accommodation, where provided, is clean, safe, and meets basic needs of the workers.

3.4 Albeit that health and safety is every employee’s responsibility, we assign responsibility for health and safety to our HSE-Q Director.

**4. Child labour shall not be used**

4.1 We do not recruit child labour nor do we expect our suppliers to do so either. Our terms and conditions stipulate the needs of this policy as part of our contractual review with our suppliers.

**5. Living wages are paid**

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

**6. Working hours are not excessive**

6.1 Working hours comply with The Working Time Regulations (1998).

6.2 Overtime is voluntary.

**7. No discrimination is practised**

7.1 Discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation is prohibited.

**8. Regular employment is provided**

8.1 To every extent possible work performed is recognised within the parameters of good employment relationships, established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations shall not be avoided.



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AND EMPLOYMENT POLICY****9. No harsh or inhumane treatment is allowed**

9.1 Physical abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

9.2 The Company will monitor its operations to ensure that human trafficking is prohibited.

**10. Supply Chain**

10.1 The Company will include a slavery and human trafficking statement in the annual accounts at the end of each financial year, 31 March. This statement must include how the Company has ensured that human trafficking or slavery is not taking place within the Company or its Supply Chain.

The Company will supply a copy of this policy if it is requested and refer to it on the Company website.

The policy will be closely monitored and will be developed as necessary to ensure that it meets the needs of the organisation, its employees and its stakeholders.

Signed:

A handwritten signature in blue ink, appearing to read "Wayne Piddis".

Dated:

A handwritten date in blue ink, "12th April 2019".

Managing Director