

PROHIBITION OF CHILD AND FORCED LABOUR POLICY

1. OVERVIEW

This policy sets out Newfield Resources Limited's (**Company**) commitment to comply the relevant statutory regimes in which the group operates and to prohibit the use of child and forced labour and take actions when child or forced labour is reported or suspected within the Company, or in any of its associates, suppliers or business partners.

2. HOW DOES THIS POLICY RELATE TO STATUTORY REGIMES?

- 2.1 This policy is furnished pursuant to the Australia Commonwealth Modern Slavery Act and the UK Modern Slavery Act. It also complies with various federal and state legislation in Australia, including the Children (Care and Protection) Act 1987, Children (Care and Protection) (Child Employment) Amendment Act No 51 of 1992 (commenced 1 September 1993), and the Industrial Relations Act 1996.
- 2.2 This policy complies with various legislation in Sierra Leone, including the Child Rights Act, No 7 of 2007, the Employer and Employed Act of 1960, the Education Act, 2004, and the Anti-Human Trafficking Act No 7 of 2005.
- 2.3 This policy complies with various conventions of the International Labour Organisations, including Forced Labour No C029 of 1930, Minimum Age Convention No C138 of 1973, and the Elimination of the Worst Forms of Child Labour No C182 of 1999.

3. RISK

As a responsible mining and exploration company, the Company is committed to a high moral, ethical, and legal standard for its labour in all its undertakings. This includes ensuring that slavery, unlawful child labour and human trafficking are not taking place in our business nor in our supply chains.

The nature of the Company's business, and the locations in which we operate, mean that it is at risk of exposure to unlawful labour practices in our supply chain, and also that the Company has the opportunity to help prevent exploitation of children and workers. For this reason, it is important that the Company's policies and procedures ensure that goods and services are sourced only from reputable suppliers who can provide evidence that forced, or child labour is not a part of their business practice.

The Company will continue to remain vigilant to ensure that this remains the case. The Company will regularly review our vendor contracts and sourcing processes periodically to ensure that its zero-tolerance policy towards slavery, unlawful child labour and human trafficking is upheld.

4. POLICY STATEMENT

- 4.1 In the conduct of its business, the Company:
 - a. will not illegally employ minors (as defined under the relevant national law) under any circumstances;
 - b. will not do business with suppliers or partnerships who illegally employ minors, or use unfair labour practices. Should a pattern of violation of these Principles become known to the Company and not be corrected, we shall discontinue the business relationship;
 - c. supports temporary workplace internship and apprenticeship education programs for younger persons and encourages safe exposure of young people to the workplace for educational purposes;

- d. together with its subsidiaries, affiliates, joint ventures or other associated entities, will not use Forced Labour in any of its operations anywhere in the world; and
 - e. will not purchase, rent, lease, borrow or otherwise use any products, goods, services or raw materials anywhere in the world made or provided by a supplier who knowingly uses forced or involuntary labour.
- 4.2 It is the responsibility of local management to implement and ensure compliance with these Principles at Company facilities in each country where we operate. The Company's Supply Chain has responsibility for ensuring the implementation and compliance with the Principles on a global basis by suppliers and contractors.

5. REPORTING SUSPECTED INCIDENTS

Suspected incidents of contravention of this policy either within the Company, or by the Company's associates, business partners or suppliers should be reported, and may be reported anonymously, via the Company's Whistleblower Policy.

6. CONSEQUENCES FOR NON-COMPLIANCE WITH POLICY

Any breach of this policy by an officer, employee or contractor will be taken seriously by the Company, and may be the subject of a separate investigation and/or disciplinary action. A breach of this policy may also amount to a civil or criminal contravention under the statutory whistleblower regimes, giving rise to significant penalties.

7. POLICY REVIEW

This policy will be reviewed by the Board annually to ensure it is operating effectively.

Version control

28 January 2022	First adoption
-----------------	----------------