



NEWFIELDS

HUMAN RIGHTS POLICY

INTRODUCTION

NewFields is committed to the highest possible standards of ethical behavior. As part of that commitment, NewFields is dedicated to respecting and promoting internationally recognized Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organization's Fundamental Conventions.

As used herein, "**NewFields**" refers to NewFields Companies, LLC together with each and every entity in which NewFields Companies or its members own a majority interest, as well as the members and employees of those entities. NewFields Human Rights Policy applies to all NewFields employees worldwide. NewFields expects that its contractors, subcontractors, business partners, clients, agents and representatives will show a similar dedication to the preservation of Human Rights by agreeing to adhere to this policy or by adopting their own comprehensive Human Rights Policy.

POLICY OBJECTIVES

The objectives of this Human Rights Policy are to:

- Inform employees, business partners and clients of NewFields' commitment to human rights;
- Provide an overview of NewFields' expectations for employees, clients, and business partners;
- Contribute to the global recognition of and respect for human rights; and
- Outline procedures to report any suspected human rights violation.

HUMAN RIGHTS GUIDELINES

NewFields conducts its business in a manner that respects the rights and dignity of all people and which complies with all applicable laws and regulations. Accordingly, the following principles are established and observed by NewFields and its employees, and NewFields expects an equal appreciation of human rights by its clients and business partners.

- All employment with NewFields is voluntary. We do not use child or forced labor in any of our offices or facilities.
- We fully respect all applicable laws or regulations establishing a minimum age for employment, in order



to support the effective abolition of child labor worldwide. The minimum age of employment by NewFields is 18, provided, however, that children ages 15 to 17 may be permitted an opportunity to intern for NewFields as part of a school-work program, or be engaged in temporary employment by NewFields during school holidays.¹ Age must be verified by review of the potential employee's birth certificate or other government-issued identification.

- We do not tolerate any form of unacceptable treatment of workers, including, but not limited to, the exploitation of children, physical or mental punishment or abuse, or involuntary servitude.
- NewFields will abide by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- NewFields respects the right of our employees or those of our business partners to join or not join a trade union, or to have recognized employee representation in accordance with local law.
- NewFields embraces diversity and recognizes that a diverse mix of backgrounds, skills and experiences benefits NewFields and its clients. A diverse workforce allowing NewFields to provide innovative, unique, and comprehensive services to its clients while promoting a positive work environment for NewFields employees.
- NewFields believes everyone should be treated with respect regardless of their background. NewFields will not tolerate discrimination based on gender, race, class, economic status, ethnic background, sexual orientation, age, political beliefs, veteran status, family status, or any other protected class. This Policy works in conjunction with NewFields Anti-Discrimination and Anti-Harassment Policy.
- NewFields expects all those with whom it does business to respect all human rights. NewFields reserved the right to terminate its business relationship with any individual or entity who has violated the principles set forth in this Policy or who has shown a lack of respect for human rights generally.

COMPLIANCE

NewFields employees must comply with this Human Rights Policy by:

1. Never infringing on human rights;
2. Being alert to any evidence of violations of human rights in connection with our business or by our business partners; and

¹ Where a NewFields affiliated entity operates in another country, that entity will follow all local laws regarding minimum employment age; however, in no event may any NewFields affiliated entity employ anyone who is under the age of 15.



3. Reporting any suspected human rights infringement to NewFields' Legal or Human Resources Departments.

Violation of this Policy or the refusal to cooperate by a NewFields employee will result in disciplinary action, up to and including termination or employment and referral to the appropriate authorities. Where NewFields has substantiated evidence that a business partner or affiliate has engaged or continues to engage in a human rights violation, NewFields similarly reserves the right to discontinue that relationships and to report such violations. In some cases, such violations may also give rise to a breach of contract action by NewFields against that business partner or affiliate.

Please contact NewFields Legal or Human Resources Departments immediately if you suspect that *anyone* affiliated with NewFields, including clients or business partners, are engaged in human rights violations. All reports of suspected human rights violations will be kept confidential and shared on a "need to know" basis only. NewFields prohibits any retaliation against an employee who makes such a report in good faith.

REFERENCES

For further information regarding human rights, please refer to:

Universal Declaration of Human Rights: <https://www.un.org/en/universal-declaration-human-rights/>

International Labour Organisation's Fundamental Conventions: <http://ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

ADMINISTRATION

NewFields Human Resources and Legal Departments are responsible for the administration, revision, interpretation, and application of this policy. The Policy will be reviewed annually and revised as needed.

APPROVALS

Approved this 7th day of February, 2020.

Patrick C. Gobb
Chief Executive Officer