



LAWFIELDS

Advocates and Legal Consultants

MODERN SLAVERY, FORCED AND CHILD LABOUR POLICY

Policy Number: LF/HRC/MSFCP/2026/01

Version: 2.0

Effective Date: 1 March 2026

Review Date: 1 March 2028

Approved By: Managing Partner, Lawfields Attorneys

1.0 POLICY STATEMENT

Lawfields Attorneys (“Lawfields” or “the Firm”) is committed to conducting its operations in a lawful, ethical, transparent, and socially responsible manner. The Firm recognises that modern slavery, forced labour, child labour, human trafficking, servitude, debt bondage, and related exploitative practices constitute serious violations of human rights, labour rights, professional ethics, and human dignity.


The Firm adopts a zero-tolerance approach to all forms of modern slavery and exploitation within:

- its employment and recruitment practices;
- its professional and operational activities;
- its procurement and supply chain arrangements; and
- its relationships with contractors, consultants, agents, suppliers, and other third parties.

Lawfields is committed to:

- preventing and identifying risks relating to modern slavery and exploitative labour practices;
- ensuring compliance with applicable Tanzanian laws and internationally recognised labour standards;
- promoting ethical recruitment and fair labour practices;
- protecting vulnerable persons, including children and migrant workers;
- encouraging reporting of concerns without fear of retaliation; and
- taking appropriate corrective, disciplinary, contractual, or legal action where violations occur.

This Policy forms part of the Firm’s broader governance, compliance, human rights, and ethical business framework.



2.0 PURPOSE

The purpose of this Policy is to:

- (a) establish clear standards prohibiting modern slavery, forced labour, child labour, trafficking in persons, and related exploitative practices;
- (b) ensure that all employment and business relationships of the Firm are conducted ethically and lawfully;
- (c) provide a framework for identifying, preventing, reporting, investigating, and addressing risks or incidents relating to prohibited labour practices;
- (d) ensure compliance with applicable legal and regulatory obligations; and
- (e) promote accountability, transparency, and responsible business conduct across the Firm's operations and supply chain.

3.0 SCOPE AND APPLICATION

3.2 This Policy applies to:

- (a) all Partners, Associates, legal officers, interns, trainees, secondees, consultants, support staff, temporary staff, and all other employees or personnel engaged by the Firm;
- (b) all contractors, suppliers, service providers, consultants, recruitment agencies, labour brokers, agents, subcontractors, and third parties acting on behalf of or providing services to the Firm; and
- (c) all offices, premises, operations, activities, engagements, and business relationships under the control or influence of the Firm.

3.3 Compliance with this Policy constitutes a condition of employment, engagement, appointment, or contractual relationship with the Firm.

3.4 The Firm expects all personnel and third parties to comply fully with the principles and requirements set out in this Policy.

4.0 LEGAL AND REGULATORY FRAMEWORK

This Policy shall be interpreted and implemented in accordance with applicable laws of the United Republic of Tanzania and relevant international labour standards, including:

- (a) the Constitution of the United Republic of Tanzania, 1977;
- (b) the Employment and Labour Relations Act, Cap. 366 R.E. 2023;
- (c) the Employment and Labour Relations (General) Regulations, 2017;
- (d) the Law of the Child Act, Cap. 13 R.E. 2023;

- (e) the Anti-Trafficking in Persons Act, Cap. 432 R.E. 2023;
- (f) the Penal Code, Cap. 16 R.E. 2023;
- (g) the Occupational Health and Safety Act, Cap. 297 R.E. 2023;
- (h) the ILO Forced Labour Convention, 1930 (No. 29);
- (i) the ILO Abolition of Forced Labour Convention, 1957 (No. 105);
- (j) the ILO Minimum Age Convention, 1973 (No. 138);
- (k) the ILO Worst Forms of Child Labour Convention, 1999 (No. 182); and
- (l) any other applicable labour, anti-trafficking, employment, or human rights laws and standards.

5.0 GUIDING PRINCIPLES

In implementing this Policy, the Firm shall be guided by the following principles:

- (a) respect for human dignity and fundamental human rights;
- (b) compliance with all applicable laws, regulations, and professional obligations;
- (c) fairness, equality, and non-discrimination in employment and labour practices;
- (d) ethical and responsible business conduct;
- (e) accountability and transparency in operations and procurement activities;
- (f) protection of vulnerable persons from exploitation or abuse; and
- (g) continuous improvement in labour rights compliance and risk management.

6.0 DEFINITIONS

For purposes of this Policy, unless the context otherwise requires:

“Child” means a person below the minimum age prescribed under applicable law.

“Child labour” means work performed by a child which is exploitative, hazardous, harmful to the child’s health, safety, morals, education, or development, or otherwise prohibited by law.

“Forced labour” means any work or service exacted from a person under threat, coercion, intimidation, abuse of authority, deception, debt bondage, penalty, or circumstances in which the person has not offered himself or herself voluntarily.

“Hazardous work” means work which, by its nature or circumstances, is likely to endanger the health, safety, education, morals, or development of a child.

“Human trafficking” or “trafficking in persons” means the recruitment, transportation, transfer, harbouring, or receipt of persons through coercion, deception, abuse of power, or other unlawful means for purposes of exploitation.

“Modern slavery” includes slavery, servitude, forced labour, debt bondage, human trafficking, exploitative child labour, and slavery-like practices.

“Recruitment fees” means any fees or costs charged to workers in connection with recruitment, placement, hiring, or retention of employment.

7.0 PROHIBITION OF MODERN SLAVERY AND FORCED LABOUR

7.2 The Firm strictly prohibits all forms of modern slavery and forced labour, including:

- (a) compulsory labour;
- (b) bonded or debt labour;
- (c) involuntary servitude;
- (d) slavery and slavery-like practices;
- (e) trafficking for labour exploitation;
- (f) withholding of wages intended to compel labour;
- (g) unlawful restriction of movement;
- (h) coercion, intimidation, threats, deception, or abuse of vulnerability; and
- (i) any other unlawful or exploitative labour practice.

7.3 Employment with the Firm shall always be voluntary and based on informed consent.

7.4 No employee, intern, contractor, or worker shall:

- (a) be compelled to work against his or her will;
- (b) be subjected to physical, psychological, economic, sexual, or verbal abuse;
- (c) have his or her movement unlawfully restricted;
- (d) be required to surrender original identification, immigration, travel, or personal documents as a condition of employment;
- (e) be subjected to unlawful deductions, deposits, recruitment fees, or financial penalties intended to compel continued employment; or
- (f) be threatened with deportation, dismissal, reporting to authorities, or other retaliation to force continued work.

7.5 All employees and workers shall be free to terminate employment or engagement in accordance with applicable law and contractual arrangements.

8.0 PROHIBITION OF CHILD LABOUR

8.2 The Firm strictly prohibits child labour in all forms.

- 8.3 The Firm shall not employ or engage any person below the minimum age permitted under applicable law.
- 8.4 The Firm shall not engage any child or young person in:
- (a) hazardous work;
 - (b) exploitative work;
 - (c) work that interferes with education;
 - (d) work harmful to health, safety, or development; or
 - (e) any activity prohibited by law.
- 8.5 Any internship, apprenticeship, industrial attachment, practical training, or work placement involving young persons shall:
- (a) comply with applicable legal requirements;
 - (b) be properly supervised;
 - (c) be conducted in a safe and professional environment;
 - (d) not expose the individual to hazardous conditions; and
 - (e) not interfere with lawful education or development.
- 8.6 Where child labour is identified within the Firm's operations or business relationships, the Firm shall take immediate and appropriate corrective measures, including reporting to relevant authorities where necessary.

9.0 EMPLOYMENT AND RECRUITMENT PRACTICES

9.2 Ethical Recruitment

The Firm shall maintain fair, lawful, and ethical recruitment practices.

The Firm shall:

- (a) verify the identity, age, and legal eligibility to work of all employees and personnel;
- (b) conduct recruitment transparently and without deception;
- (c) prohibit recruitment fees or placement costs charged to employees or candidates;
- (d) engage only reputable recruitment agencies and labour providers; and
- (e) require recruitment agents and labour brokers to comply with this Policy.

9.3 Employment Contracts

- (a) All employees shall receive written employment contracts in a language they understand.
- (b) Employment contracts shall clearly specify:

- remuneration and benefits;
- working hours;
- leave entitlements;
- duties and responsibilities;
- disciplinary procedures; and
- termination provisions.

(c) Employees shall be given adequate opportunity to review and understand employment terms prior to commencement of work.

9.4 Working Conditions

The Firm shall ensure that:

- (a) working hours comply with applicable law;
- (b) employees receive lawful wages and benefits;
- (c) employees are provided with lawful rest periods and leave entitlements;
- (d) the workplace is safe, respectful, and free from harassment or abuse; and
- (e) employees are treated with dignity and professionalism at all times.

10.0 SUPPLY CHAIN AND THIRD-PARTY COMPLIANCE

10.2 The Firm expects all suppliers, contractors, consultants, service providers, agents, and business partners to comply with this Policy and applicable labour laws.

10.3 The Firm may undertake reasonable due diligence measures to assess and monitor compliance by third parties.

10.4 Third parties engaged by the Firm may be required to:

- (a) provide declarations or certifications of compliance;
- (b) disclose labour and recruitment practices;
- (c) permit compliance assessments or audits where appropriate; and
- (d) implement corrective measures where concerns are identified.

10.5 The Firm reserves the right to suspend, terminate, or decline to renew engagements with any third party involved in:

- (a) forced labour;
- (b) child labour;

- (c) trafficking in persons; or
- (d) related exploitative or unlawful practices.

10.6 Where appropriate, the Firm may report suspected unlawful conduct to relevant regulatory, labour, or law enforcement authorities.

11.0 RISK ASSESSMENT AND DUE DILIGENCE

11.2 The Firm acknowledges that risks relating to modern slavery and exploitative labour practices may arise within:

- (a) outsourced services;
- (b) recruitment and staffing arrangements;
- (c) office maintenance and facilities management;
- (d) security, cleaning, catering, and courier services;
- (e) technology and hardware supply chains; and
- (f) other third-party operational relationships.

11.3 The Firm may undertake periodic risk assessments to identify, evaluate, and manage exposure to modern slavery risks.

11.4 Appropriate due diligence measures may include:

- (a) supplier screening and vetting;
- (b) contractual compliance requirements;
- (c) review of recruitment practices;
- (d) compliance declarations;
- (e) monitoring and reporting procedures; and
- (f) targeted audits or reviews where appropriate.

12.0 AWARENESS AND TRAINING

12.2 The Firm shall provide periodic training and awareness programmes relating to:

- (a) modern slavery risks and indicators;
- (b) forced labour and child labour prohibitions;
- (c) applicable legal and ethical obligations;
- (d) ethical recruitment practices;
- (e) supply chain compliance;
- (f) reporting obligations; and

(g) whistleblowing procedures.

12.3 All new employees and relevant third parties shall be informed of this Policy during onboarding or engagement processes.

12.4 Personnel responsible for procurement, recruitment, human resources, or compliance functions may receive specialised training on modern slavery risk management and due diligence.

13.0 REPORTING AND WHISTLEBLOWING

13.2 Any person who suspects, witnesses, or becomes aware of conduct that may constitute modern slavery, forced labour, child labour, trafficking, or related misconduct shall promptly report the matter.

13.3 Reports may be made through:

- (a) the Firm's whistleblowing mechanism;
- (b) direct reporting to the Managing Partner, Practice Manager, or Human Resources function; or
- (c) any other reporting mechanism established by the Firm.

13.4 The Firm shall:

- (a) treat all reports seriously and confidentially;
- (b) conduct fair, impartial, and timely investigations;
- (c) take appropriate corrective, disciplinary, or remedial action where necessary; and
- (d) protect whistleblowers from retaliation, intimidation, victimisation, harassment, or adverse treatment.

13.5 Any person who knowingly makes false, malicious, or misleading allegations may be subject to disciplinary action.

14.0 INVESTIGATION, REMEDIATION, AND CORRECTIVE ACTION

14.2 The Firm shall investigate all credible allegations or reports relating to prohibited labour practices.

14.3 Where violations are established, the Firm may take appropriate action, including:

- (a) disciplinary measures;
- (b) termination of employment or engagement;
- (c) suspension or termination of supplier or contractor relationships;
- (d) implementation of corrective and remedial measures;
- (e) reporting to relevant authorities; and
- (f) cooperation with law enforcement or regulatory agencies.

- 14.4 Where victims of exploitation are identified, the Firm shall, where reasonably practicable and lawful, facilitate access to appropriate support, protection, or referral mechanisms.
- 14.5 Any employee or third party found to have engaged in prohibited conduct may also be subject to civil, regulatory, or criminal liability under applicable law.

15.0 ROLES AND RESPONSIBILITIES

- 15.2 The Managing Partner shall:
- (a) provide overall oversight and accountability for implementation of this Policy;
 - (b) promote ethical labour practices and compliance culture within the Firm; and
 - (c) ensure appropriate governance and reporting mechanisms are maintained.
- 15.3 The Practice Manager or designated officer shall:
- (a) oversee implementation and monitoring of this Policy;
 - (b) coordinate training and awareness initiatives;
 - (c) maintain relevant records and compliance documentation;
 - (d) oversee reporting, investigations, and corrective actions where appropriate; and
 - (e) periodically review the effectiveness of the Policy.
- 15.4 All employees and personnel shall:
- (a) comply with this Policy;
 - (b) avoid conduct that may facilitate or contribute to prohibited labour practices;
 - (c) cooperate with investigations and compliance reviews; and
 - (d) promptly report suspected violations or concerns.

16.0 MONITORING, REVIEW, AND COMPLIANCE

- 16.2 The Firm shall periodically monitor compliance with this Policy.
- 16.3 Internal reviews may be conducted to assess:
- (a) effectiveness of the Policy;
 - (b) compliance levels;
 - (c) identified risks and incidents;
 - (d) adequacy of controls and reporting mechanisms; and
 - (e) effectiveness of corrective measures.

16.4 This Policy shall be reviewed periodically and may be amended where necessary to reflect:

- (a) changes in applicable law;
- (b) regulatory developments;
- (c) international standards;
- (d) operational requirements; or
- (e) identified compliance risks.

16.5 Non-compliance with this Policy may result in disciplinary action, contractual remedies, termination of engagement, or referral to competent authorities.

17.0 POLICY IMPLEMENTATION AND ACCESSIBILITY

17.2 This Policy shall be communicated to all employees and relevant stakeholders.

17.3 The Policy shall be accessible through appropriate internal communication channels and may be shared with clients, contractors, suppliers, or regulators where appropriate.

17.4 The Firm shall take reasonable measures to ensure that all personnel understand their rights, obligations, and responsibilities under this Policy.

18.0 APPROVAL

This Policy has been approved by the Partners of Lawfields Attorneys and takes effect from the Effective Date stated above.

Approved By:



Honest J. Lugalla

Managing Partner