

Modern Slavery and Human Trafficking Statement **for the Financial Year Ending 31 August 2019**

Introduction

This statement sets out the steps taken by Newton Europe Limited (“Newton”) to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. Slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. Given the nature of the work that we do, we believe that there is a low risk of slavery or human trafficking having any connection with our business. We must, however, not be complacent, and all staff have a responsibility to be aware of any risks in our business and in our wider supply chains, no matter how remote the possibility, and report any concerns to senior management.

Our business

Newton delivers performance improvement programmes, implementing increases in quality and financial performance by focusing on organisations’ systems, processes, skills and structure and implementing benefits at the front line. We have a strong focus on the defence, health care, local government and retail sectors.

Newton is a UK-based organisation and our ultimate parent company is Newton Industrial Consultants Holdings Limited which is a company registered in England and Wales.

Our supply chains

Our supply chains comprise primarily services, including professional advisory services. We have reviewed our supply chains and believe the overall risk of modern slavery is low owing to:

- The nature of the goods and services which we procure (mostly skilled professional services);
- The locations from which we procure it (in developed markets); and
- Our procurement practices (for example, we agree to reasonable terms and ensure timely payment).

Our policies on slavery and human trafficking

We have a zero-tolerance approach to modern slavery and human trafficking and we are fully committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We believe in paying people fairly and properly for their work. This policy and our internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains. We set clear expectations for our suppliers by informing them that Newton does not tolerate modern slavery

or any form of human trafficking within its business or supply chains and that Newton does not allow harsh or inhumane treatment and we expect our suppliers to share our values.

- Monitor potential risk areas in our supply chains. Staff are encouraged to report any concerns to senior management.
- Ensure appropriate recruitment practices are carried out. We verify the practices of any new recruitment agency as part of our terms of business with them and before accepting any workers from that agency.
- Protect whistle blowers. At Newton, workers are encouraged to report any concerns related to our activities or supply chains. Our 'speak up' hotline is designed to make it easy for people to make disclosures without fear of retaliation. Concerns or issues can be raised anonymously through this channel.

Supplier adherence to our values

We require that all contractual agreements with third party suppliers to contain obligations to ensure compliance with the Modern Slavery Act 2015.

As part of any due diligence exercise during supplier on boarding or at regular intervals, potential slavery concerns must be assessed and addressed.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be providing training to appropriate members of staff.

Our commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Newton's slavery and human trafficking statement for the financial year ending 31 August 2019.

Following its initial adoption, this Modern Slavery and Human Trafficking Statement will be reviewed by Newton's Board of Directors at least annually and may be amended from time to time.



Director
Newton Europe Limited
Date: 1 September 2018