

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING 31 AUGUST 2025

Introduction

This statement is made by Newton Consulting Limited (“**Newton**”) pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 August 2025. It set out the steps we have taken and will take to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Our business

Newton is a consultancy delivering 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, infrastructure, health care, local and central government and retail sectors.

We are part of the Newton group and our ultimate parent company is Newton Group Holdings Limited. Our head office is in Oxfordshire, United Kingdom, and we operate primarily in the United Kingdom, Australia and the United States. We have over 650 employees.

The Newton group’s other main operating companies are:

- Newton Consulting Inc. (incorporated in Delaware, U.S.);
- Newton Consulting International Pty Limited (incorporated in New South Wales, Australia);
- Xantura Limited (incorporated in England); and
- Fluxx Limited (incorporated in England, trading as Magnetic).

Our policies on slavery and human trafficking

Slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse.

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. We review and update these policies continuously.

Our supply chains

Given the nature of the work that we do, and categories and geographies of the goods and services we procure, we believe that there is a low risk of slavery or human trafficking having any connection with our business. In the financial year ending 31 August 2025, no instances of slavery or human trafficking were found in our supply chain.

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 supply chains comprise primarily:

1. General business services, including:
 - Suppliers of IT hardware and software.
 - Suppliers specialising in events and accommodation.
 - Suppliers of utilities.
 - Recruitment agencies.
 - Professional advisory suppliers.
2. Sub-contractors and associates who provide specialist support for our client engagements.

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).

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 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.

Next steps

For the upcoming financial year ending 31 August 2025, we plan to carry out the following actions:

- Review key suppliers (selected on the basis of spend, sustainability and slavery and human trafficking risk) to identify any risk areas.
- Strengthen our supplier onboarding and management processes, including identifying KPIs to track our suppliers' commitment to tackling slavery and human trafficking.
- Improving employee awareness of modern slavery, including exploring opportunities to provide training to our procurement specialists and other relevant business areas.

This statement was approved by the board of Newton Consulting Limited and signed on its behalf by:

A handwritten signature in black ink, appearing to read 'S. Phillips'.

Steven Phillips

Managing Director

30 August 2025