
NEWTON CODE OF CONDUCT

ALL EMPLOYEES

NE-HR-PO-10

NEWTON

NE-HR-PO-10	NEWTON CODE OF CONDUCT					NEWTON
Department:	Human Resources		Owner:	HR Operations Manager		
Status	ISSUED	Revision:	5.0	Date Issued:	26/06/2023	
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1 INTRODUCTION

This policy outlines the Code of Conduct that all Newton employees must follow in all commercial engagements, whether local or international.

2 LOCAL AND FOREIGN LAWS

No officer, employee or representative of Newton may, directly or indirectly, break or seek to evade the laws or regulations of any country in, through or with which it seeks to do business. That an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision. Any local custom or practice must be disregarded, unless permitted or required by the written law applicable to the particular country.

3 BRIBERY AND FACILITATING PAYMENTS

No officer, employee or representative of Newton may, directly or indirectly, offer or provide a bribe and all demands for bribes must be expressly rejected.

Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

Newton and its officers, employees and representatives shall not offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake.

4 KICK-BACKS

No officer, employee or representative of Newton may “kick-back” any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.

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A “kick-back” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kick-back) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

5 CONFLICTS OF INTEREST

Officers, employees and representatives of Newton shall avoid any relationship or activity that might impair, or appear to impair, his or her ability to render objective and appropriate business decisions in the performance of his or her job.

Concerns about any conflict, or potential conflict, should be raised with HR at the earliest opportunity.

6 POLITICAL CONTRIBUTIONS

Neither Newton nor any of its officers, employees or representatives may make a political contribution in order to obtain an unlawful business advantage. Newton shall comply with all public disclosure requirements.

7 PHILANTHROPIC CONTRIBUTIONS

Newton and its officers, employees and representatives may make contributions only for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

8 EXTORTION

Newton and its officers, employees and representatives shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

9 REPORTING REQUIREMENT

Officers, employees and representatives of Newton who find themselves subjected to any form of extortion or who are asked to participate in any way in a bribery scheme shall promptly report these occurrences to senior corporate management, without fear that their employment will be adversely affected.

10 COMPANY RESPONSE

No employee will suffer demotion, penalty, or other adverse consequences for not paying bribes even when Newton may lose business as a result of the employee’s refusal to do so. Employees are encouraged to report alleged violations of this Code of Conduct to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.

Newton will, where appropriate, sanction employees, suppliers or business partners for violations of this Code of Conduct. Employee violations of this Code of Conduct will be dealt with in line with the Company disciplinary procedure.

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11 COMPANY ACCOUNTS

Newton shall maintain complete and accurate financial records, ensuring that all transactions are properly, accurately and fairly recorded in a single set of books.

12 WHISTLEBLOWING PROCEDURE

All employees are able to raise concerns relating to their own employment either informally or through the Company grievance procedure. Where an employee is concerned about malpractice or impropriety within Newton, they are able to raise this concern through the whistleblowing procedure, without fear of reprisal or detrimental treatment. Whistleblowing normally concerns matters that are in the public interest such as:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Any employee wishing to “blow the whistle” should address the concern to their line manager or another appropriate manager. If they wish, they may bypass the line management structure and report the concern to a Director or to HR.

All employees who raise a concern in good faith and with a reasonable belief that malpractice or impropriety may be occurring will be offered protection. This means that if an employee raises a concern in good faith that is shown to be unfounded following a full investigation, they will not be subject to any disciplinary action. Malicious claims of whistleblowing will be investigated in line with the Company disciplinary procedure.

Newton uses a reporting hotline, [Speak Up](#), provided by EthicsPoint. This is a confidential external reporting hotline created by NAVEX Global, for reporting whistleblowing concerns or other sensitive matters that employees do not feel able to raise with their LM or HR. NAVEX Global will take details of the complaint and raise them with the People Team for investigation as appropriate. The individual can choose whether to provide their name as part of the report, so if they wish to be involved in the investigation. If they don't disclose their name, the findings of the investigation will be fed back to NAVEX Global, to feed back to the complainant.

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13 DOCUMENT CONTROL HISTORY

Version	Date created	Owner	Approved by	Description
1.0	19/04/2010	Ben Park	Tom Wedgwood	Initial drafting of code of conduct, specifically including bribery policy
2.0	23/05/2011	Ros King		Review to ensure compliance with Bribery Act 2010
3.0	10/02/2013	Ros King	Kevin Jones	Reviewed
3.1	24/03/2014	Justine Pavey	Kevin Jones	Reviewed and ownership transferred to Justine Pavey
3.2	03/09/2015	Justine Pavey	Kevin Jones	Reviewed
3.3	26/05/2015	HR Advisor	HR Director	Changes in ownership and approver titles
3.4	19/05/2016	HR Advisor	HR Director	Reviewed
3.5	25/05/2017	HR Advisor	HR Director	Reviewed
3.6	06/04/2018	HR Operations Manager	Chief Operating Officer	Reviewed
3.7	03/04/2019	HR Operations Manager	Chief Operating Officer	Reviewed. Added 'Speak Up' helpline
3.8	02/04/2020	HR Operations Manager	Chief Operating Officer	Reviewed.
3.9	23/04/2021	HR Operations Manager	Chief Operating Officer	Reviewed. Sections on Gifts/Hospitality and Comms/Training moved to new Anti-Bribery policy
4.0	13/09/2021	Harveen Javed	Fred Church	Speak Up hotline link updated. Re-formatted.
4.0	04/01/2023	Harveen Javed	Fred Church	Reviewed – no changes needed.
5.0	23/05/2023	Senior HR Advisor	Jae Bennett Harveen Javed	NAVEX Global name updated.
5.0	31/10/2024	People Director	Assurance Lead	Fit for purpose. HR policies are undergoing a deep review & consolidation within the next year

Newton Internal Use Only

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