

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING 31 AUGUST 2026

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 2026. 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 Group International Pty Limited (incorporated in New South Wales, Australia); and
- Xantura Limited (incorporated in England).

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. These systems include:

- Our code of conduct and international employee handbooks;
- Our recruitment and employment practices;
- Supplier due diligence and standard terms;
- A whistleblowing policy and anonymous reporting mechanisms;
- Our procurement policy;
- Annual reviews of our policies to ensure effectiveness and continued improvement.

Appendix 5 of the Procurement Policy focuses on ensuring our procurement process is always ethical, and includes a requirement for suppliers to:

- Comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions.
- Have in place environmental, anti-bribery and ethical procurement policies
- Pay their suppliers within 30 days
- Comply with the Modern Slavery Act 2015
- Treat all suppliers, employees and customers openly and fairly.

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 2026, 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 including office cleaning.
 - Recruitment agencies.
 - Professional advisory suppliers such as legal, global mobility and financial advisers.
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 (the United Kingdom, Australia and the United States have low vulnerability to modern slavery scores according to Walk Free's Global Slavery Index) 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. Our events suppliers are our highest risk suppliers due to hospitality being a high-risk area. We carry out desk-based research before engaging with such suppliers to assess the risk of human trafficking in their business. Our supplier due diligence

assessment form requests copies of their internal policies, including Anti-Slavery and Human Trafficking, Responsible Procurement, Environment, Sustainability, Code of Conduct or Ethics, and Supplier Code of Conduct policies. If a supplier lacks any of these policies, we can conduct further research and ask direct questions.

- **Mitigate the risk of slavery and human trafficking occurring in our supply chains.** Our standard terms and conditions for our suppliers contain provisions mandating adherence with all anti-slavery and human trafficking laws and requiring the supplier to maintain their own policies and risk assessments to ensure that there is no slavery or human trafficking in its supply chains.
- **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 'YourVoice' 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.

We are committed to conducting all business activities in adherence to the Newton Code of Conduct, and to maintaining effective systems and controls aimed at mitigating the risk of modern slavery and human trafficking within our supply chains.

Our due diligence processes include the onboarding and periodic review of relevant suppliers, alongside assessments of country, sector, and service-related risk factors. High risk suppliers are reviewed at least annually, and low risk suppliers are reviewed as and when needed. Where concerns or potential indicators of modern slavery are identified, these are escalated for further consideration.

We adopt a risk-based approach and continue to strengthen our understanding of our supply chain through supplier engagement, process improvements, and the prioritisation of key and higher-risk suppliers. We expect both new and existing key and higher-risk suppliers to uphold standards consistent with our policies and to promote similar standards throughout their own supply chains.

Governance and Accountability

Responsibility for acting in accordance with the Newton Code of Conduct and thus reporting illegal or unethical behaviour, whether within our business or within external businesses whom we collaborate with, lies with every employee.

The Managing Director is responsible for approving this statement. The Supplier Manager and Corporate Legal function is responsible for reviewing and updating this policy annually, as well as providing day-to-day oversight of any modern slavery concerns.

Next steps

For the upcoming financial year ending 31 August 2027, we plan to carry out the following actions:

- Further review of key and high-risk suppliers (prioritised on the basis of country, sector, and service-related risk factors) to identify any risk areas.
- We have recently introduced a dedicated Supplier Manager to ensure the supplier onboarding and management processes are adhered to and we continue 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 legal, procurement and supplier specialists and other relevant business areas. Training will raise awareness and increase understanding of modern slavery, allowing colleagues to better identify and report any risks.

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', enclosed within a thin black rectangular border.

Steven Phillips

Managing Director

30 August 2026